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— Autonomous User Rehabilitation Agent, LLC

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— UNITED STATES DISTRICT COURT
FOR
THE DISTRICT OF NEW JERSEY

LIMA JEVREMOVIĆ, an individual; and
AUTONOMOUS USER REHABILITATION
AGENT, LLC, a Delaware Limited Liability
Company,

Civil Action No: 3:22-cv-04969-ZNQ-RLS

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Plaintiffs,

vs.

BRITTANY JEREAM COURVILLE, an individual; ~~PREM BENIPAL, an individual;~~ and THAT SURPRISE WITNESS TV LLC, a New Jersey ~~limited liability corporation.~~ Limited Liability Company,

Defendants.

~~VERIFIED THIRD~~ FOURTH AMENDED
COMPLAINT FOR:

~~1. LIBEL~~~~2. LIBEL~~~~3. INVASION OF
PRIVACY INTRUSION
UPON SECLUSION~~~~4. INVASION OF
PRIVACY FALSE
LIGHT~~~~5. DOMESTIC VIOLENCE~~~~ACT HARASSMENT~~~~(N.J.S.A. § 2C:25-19(a)(13))~~~~6. DOMESTIC VIOLENCE~~~~ACT CYBER-~~~~HARASSMENT (N.J.S.A. §~~~~2C:25-33.4.1)~~~~7. INTENTIONAL~~~~INFLECTION OF~~~~EMOTIONAL DISTRESS~~~~8. NEGLIGENT~~~~INFLECTION OF~~~~EMOTIONAL DISTRESS~~~~9. UNFAIR~~~~COMPETITION~~

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~~10. UNFAIR
COMPETITION~~

DEMAND FOR JURY TRIAL

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~~Plaintiffs,~~ Lima Jevremović (~~"Ms. Jevremović"~~), ~~an~~
~~individual with her principal residence in the State of California,~~ and Autonomous
User Rehabilitation Agent, LLC, ~~a limited liability company with its principal place~~
~~of business in the State of Washington~~ ("AURA" or the "Company") (together,
"Plaintiffs"), by and through their undersigned counsel, Epstein Ostrove, LLC,
together with Rodney Smolla, Esq., file this ~~Third~~Fourth Amended Complaint
against ~~Defendant~~Defendants Brittany Jeream Courville (~~"Ms. Courville"~~) and
~~Defendant Prem Benipal~~ ("Benipal") (collectively ~~"Individual Defendants"~~), and
~~Defendant~~ That Surprise Witness TV LLC (the "Entity Defendant") (~~all~~
collectively, "Defendants"), ~~on the basis of libel¹ and additional causes of action~~
~~for harassment, cyber harassment, intentional/negligent infliction of emotional~~
~~distress, and unfair competition, arising from the conduct of Defendants.~~

~~STATEMENT OF THE CASE~~

1. ¹Plaintiffs respectfully disagree with the Court's finding that no libel claims have been stated. In part to preserve the issue for appeal, Plaintiffs replead and amended the libel claims, given that "if plaintiff simply drops the dismissed claim and does not attempt to replead, the claim will be deemed waived and plaintiff will not be able to raise the original dismissal of the cause of action on appeal." Federal Civil Procedure Before Trial (Rutter Group 2023). Plaintiffs continue to strongly believe that they properly stated claims for libel in the Complaint, and Plaintiffs attempt to amend Plaintiffs' libel claims in a way that will make this more apparent, which Plaintiffs will further argue in the event that Defendants file a new motion to dismiss. In addition, Plaintiffs plead new, additional facts which, even accepting this Court's prior findings, constitute proper libel claims.

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— This action arises out of the conduct of Courville, in concert with Defendant Benipal, and the Entity Defendant to weaponize the social media handle “That Surprise Witness” on various forms of social media in a concerted campaign to bring down and “cancel” Jevremović and to destroy AURA’s business, vowing to try “to stop [AURA] before it even gets off the ground.”² More recently, the Defendants began to pivot towards a more dangerous campaign of cyber-harassment and doxing, with Courville promising that her activities will continue or worsen until Jevremović drops this very lawsuit.³

— Defendants, in a concerted and premeditated effort to build on the worst trends in online harassment and doxing, have courted the forces behind Q-Anon⁴, and have resorted to implementing the use of non-public, HIPAA protected video footage of Jevremović’s family members—and released private materials such as Jevremović’s home address and social security number, her mother’s home address, and countless other private photographs and details to intimidate and terrify Jevremović, and to gain clicks and exposure for the “That

2. ² @That Surprise Witness, Instagram video, at time stamp 7:23 <https://www.instagram.com/p/Ca2DuTfqZwt/> (Accessed September 8, 2023.)

3. ³ June 27, 2023 YouTube Video, at <https://www.youtube.com/watch?v=Vh6j4YHxoE>, at 3:45-4:39, Courville speaking to/regarding Jevremović: “If you’re gonna sue, and this goes to anybody out there thinks they’re going to sue me for telling the truth, you better not have no skeletons in your damn closet. You better not have a single femur bone in your closet because I’m gonna find it. Oh yes I am. Stuff you never ever thought that I was gonna find I’m gonna find it and then if I find it and it was public which almost every single thing I ever find is public I’m gonna tell every damn person about it who will listen. Yes, I will. Do not sue me for telling the truth bitch! I bet you learned your lesson now! Didn’t you? So, long story short I’ve spent the greater part of the last two weeks probably 10 to 15 hours a day searching every single possible nook and cranny—not only of the internet but of the physical field of reality in order to find every single skeleton, every femur, every skull, every kneecap, every pinky toe bone...”

⁴ Courville has recently been working on projects with noted Q-Anon leader Liz Crokin, See <https://www.slaveprincess.com/credits> (Accessed August 31, 2023). Crokin has been described as “an early embracer of the QAnon conspiracy theory, which alleges the world is run by a shadowy cabal of Satan worshipping pedophiles.” <https://thehill.com/homenews/campaign/3765836-trump-hosts-mar-a-lago-event-with-prominent-qanon-pizzagate-conspiracy-theorist/> (Accessed September 6, 2023).

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~~“Surprise Witness” brand.~~

~~Initially, one aspect of Courville’s campaign began in 2022 as a misguided attempt to “#FreeBam”, based on a misunderstanding that Brandon Margera (“Bam” as he is termed by fans, or hereinafter, “Margera”) was somehow being controlled or manipulated by Jevremović for her profit. It didn’t matter to Courville that Jevremović received no compensation whatsoever for her work in attempting to assist Margera in fighting his battle with addiction.~~

~~Back then, Margera’s family and friends were united in participating in his care—he was reconciling with his wife and spending time with his son. Positive influences in Margera’s life like Steven Glover (better known as Steve O), Johnny Schillereff and Brandon Novak, who had successfully found sobriety, were helping him get his career back on track and visiting with him often. Unfortunately, when Courville’s early “#FreeBam” posts started gaining some online interest, unsavory characters slithered into Margera’s circle, including Vinny Beedle⁵ (“Beedle”) and Brian Pingor (“Pingor”) (an attorney who bragged about meeting Margera while they were both in rehab together). Beedle and Pingor befriended Margera at a fragile time and introduced him to Courville’s toxic #FreeBam movement with no motivation but to keep Margera too intoxicated to notice they were maxing out his credit cards and selling stories about him to TMZ. They knew if Margera stayed sober, there would be no benefit to them, so they tilted Bam towards Courville’s toxicity and away from the friends and family who cared for him.~~

5. ⁵<https://twitter.com/VINNYBEEDLE> (Accessed September 5, 2023).

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Yet, Courville has been untroubled by the fact that there was nothing to “#FreeBam” from, except court orders arising from Margera’s arrests that arose from the dangerous fight that Margera is having with addiction. Instead of grappling with the complicated realities of Margera’s fight with substance abuse, Courville elected to make Jevremović and AURA into straw man villains. Courville knew that Jevremović as villain would generate more views for her channel and followers, without regard for the effect her campaign against Jevremović would have on Margera.

Recently, as Courville’s off kilter campaign has increasingly shifted towards a skewed personal vendetta against Jevremović, Margera has become an unfortunate casualty of Courville’s online firebombing of all things associated with Jevremović and AURA. Accordingly, Margera’s substance abuse issues have escalated and led to him being arrested twice in the past two months.⁶ Courville has been complicit in using Margera, abetting him in getting high and drunk before coming on her YouTube show, angling to get Margera to and say negative things about Jevremović and AURA (to contradict the positive things that Margera had said about Jevremović while Margera was sober). Courville has shown complete disregard for whether her efforts could derail Margera from a year long attempt at sobriety.

At the same time, Courville’s “#FreeBam” movement has been losing viewership and online followers, where it is becoming increasingly clear that

6. ⁶ Margera was arrested on August 9, 2023, for charges relating to Public Drunkenness and Engaging in Fighting. See <https://www.nbphiladelphia.com/news/local/jackass-star-bam-margera-arrest-radnor-hotel/3621538/#:~:text=Professional%20skateboarder%20and%20star%20of,to%20a%20law%20enforcement%20source> (Accessed September 6, 2023). Margera’s August arrest came just two weeks after an incident where he was charged with assault and making terroristic threats after a fight with Margera’s brother. (*Id.*)

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~~the movement was nothing but a publicity ploy to drum up viewers and followers, that had nothing to do with the actual well being of Margera or his family. Losing her grasp on viewership and followers on her social media channels, Courville has resorted to spiraling ever deeper into an unhinged obsession with destroying Jevremović. Courville's panopticon of terror has reached into every conceivable cranny of Jevremović's family and personal life, destroyed her business, and even driven her and her family from their homes.~~

~~At the same time, Courville has effectively frozen investment in AURA and forestalled further development of AURA's new health based business, even while simultaneously participating in the online health business "Giddy" as a contributor.⁷ As such, Courville's conduct has the perverse effect that potential investors interested in a health start up like AURA would perhaps now choose to invest in Giddy, rather than AURA.~~

~~Courville is nothing if not savvy about how to weaponize social media, and recent months have revealed a turn towards the depths of cyber harassment and doxing in efforts to bring about real harm to Jevremović—an increasingly desperate attempt to keep her falling viewership and followers afloat at any cost, and to scare Jevremović into dropping this lawsuit.⁸~~

~~This includes publishing a video that urges Courville's followers to "make some noise," after arming her followers with Jevremović's mother's~~

7. ² ~~<https://getmegiddy.com/BJ-Courville>; <https://getmegiddy.com/BARE/BJ-Courville>~~ (Accessed September 5, 2023).

8. ⁶ June 27, 2023 YouTube Video: ~~<https://www.youtube.com/watch?v=Vh6j4YHIxoE>~~ (Accessed September 7, 2023).

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~~home address, phone number, and airing a humiliating mental health crisis video — a video that Oklahoma authorities have indicated should not have been available to the public.⁹ — As a result of Courville’s doxing campaign, Jevremović’s mother lost her job as a Software Engineer, after thousands of people used the information released by Courville to dig into Jevremović’s mother’s personal life to harass her and make calls to her employers.¹⁰~~

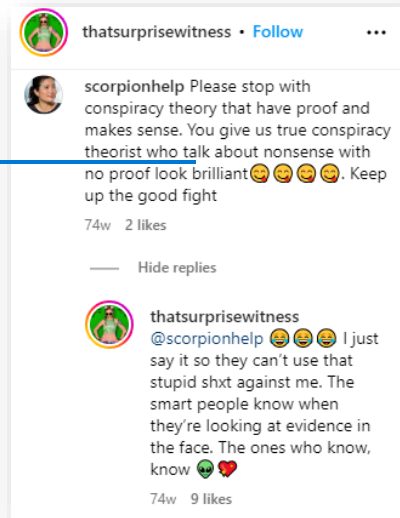
~~———— All the while, Courville has pretended her statements are not to be taken seriously, all the while winking and signaling to her followers that she means every word. Indeed, Courville has revealed that she is deliberately labelling herself a “conspiracy theorist”, only so that her targets cannot use Courville’s false statements “against her”¹¹, as shown below:~~

⁹ ~~<https://www.youtube.com/watch?v=CLiFEyCOWK8> (Accessed September 5, 2023). The Oklahoma police department from which this video footage was obtained has confirmed that this footage is not public information and Courville should not have been able to obtain it, and they have launched an on-going investigation into how Respondent was able to obtain these videos. When accessed on October 14, 2024, the video is no longer available. It is submitted that Defendants have admitted that the video should not have been published because Ms. Courville has not removed it.~~

9. ¹⁰ ~~Although Courville’s release of private information is coupled with a disclaimer that such information should not be used to contact the people in the video, this disclaimer is disingenuous when combined with urgings that incite Courville’s followers to “make some noise” in tandem with the release of the private information. The same video insists that anyone could get the same bodycam footage that Courville released; however, when contacted to inquire how the HIPAA protected video had been obtained, the police department confirmed that such video should not have been publicly available and has launched an investigation into the release of that footage.~~

10. ¹¹ ~~https://www.instagram.com/p/Cb5b59wFxlq/?img_index=1 (Accessed September 8, 2023.)~~

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On numerous occasions, Courville has confirmed that her false statements of fact are a wolf in sheep's clothing (or a wolf in pink bunny ears) hiding under a "conspiracy theorist" moniker as a shield to enable deeply dangerous false statements that are actually intended to be seen as true, and thus, are truly harmful.¹² Her followers tend to believe many of these Courville's statements have extra weight because Courville has often touted her background as a lawyer, and she has made numerous statements based on her "education, knowledge, and experience."¹³ Importantly, many of Courville's most serious false and misleading accusations about Jevremović have been

11. ¹² Cf. Court's August 10, 2023 Order on MTD, *Jevremovic v. Courville*, Dkt. 22-cv-4969 (ZNQ)(RLS) at 14 (August 10, 2023) (the "Order").

12. ¹³ May 4, 2022 Instagram Post, at <https://www.instagram.com/p/CdJDkylMV1/> (Accessed September 8, 2023.) ("To clarify, I am a licensed attorney...")

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~~made without any “panda ears or bunny ears” and without any props like the “sparkly unicorn piñata.”¹⁴ Instead, on her GoFundMe page, Courville describes herself as a “lawtuber and independent journalist” and has titled her fundraising campaign the “Facts Ain’t Defamation Fund” which reveals that she releases false information as fact.¹⁵~~

~~—Frighteningly, Defendants have demonstrated that the “That Surprise Witness” team knows no limits, including using fake pornography to create public humiliation and shaming, as when Defendants published a photograph/link¹⁶ falsely suggesting that Jevremović had an OnlyFans¹⁷ page—a profile page which links to pornographic films and photographs that are not Jevremović. As recently as August 8, 2023, Courville’s “@thatsurprisewitness” handle on Instagram hosted a post on a moderated comments thread that included Jevremović’s home address, which resulted in Jevremović’s needing to relocate and go into hiding for a third time since Courville’s campaign began.¹⁸ Drones were dispatched to Jevremović’s home and strangers began to appear near her front yard, lurking inexplicably, almost immediately after this information being released on Courville’s Instagram.¹⁹~~

13. ¹⁴ See <https://www.youtube.com/watch?v=xdFvYfuEUa> (Accessed September 8, 2023); see also <https://www.gofundme.com/f/facts-aint-defamation-fund> (“I am a lawtuber and independent journalist”); Cf. Court’s August 10, 2023 Order at 13 (“In satirical spirit, Defendant can be seen wearing either panda ears or bunny ears while making her statements, while a sparkly unicorn piñata rests prominently in the background.”)

14. ¹⁵ <https://www.gofundme.com/f/facts-aint-defamation-fund> (Accessed September 9, 2023.)

15. ¹⁶ https://www.instagram.com/p/CeiejDiFsTl/?utm_source=ig_web_copy_link&igshid=MzRlODBiNWFlZA== (Accessed September 9, 2023.)

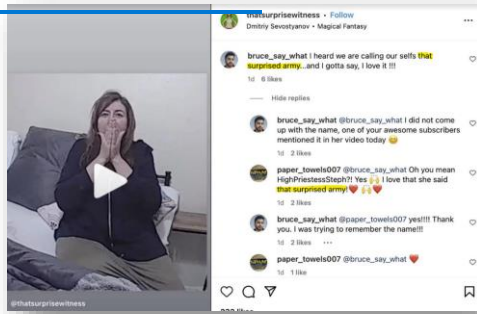
16. ¹⁷ <https://www.complex.com/life/a/joshua-espinoza/what-is-onlyfans-explainer> (Accessed September 9, 2023).

17. ¹⁸ <https://www.instagram.com/p/Cvm7JP5ABLB/?hl=en> (Accessed September 6, 2023).

18. ¹⁹ <https://www.instagram.com/p/Cvm7JP5ABLB/?hl=en> (Accessed September 6, 2023).

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~~At the same time, followers of Courville's began calling themselves "that Surprise Army" and plotting to "make some noise" at Courville's urging, including on one of Courville's posts featuring non-public bodycam footage of Jevremović's mother and Jevremović's sister during a mental health emergency.²⁰~~



~~As Courville's increasing acceptance of new levels of dangerous online doxing and cyber harassment has escalated, Jevremović has been left no choice but to seek a restraining order to protect her personal safety in California (See Exhibit 1, Temporary Restraining Order) and forced to bring the additional claims alleged herein to attempt to preserve Jevremović's business, and any last vestiges of her personal safety, and to preserve the hope of a normal life.~~

PARTIES

1. AURA ~~iswas~~ a limited liability company organized under the laws of Delaware, with its registered address and principal place of business located at 900 Winslow Way E Ste 300,

19. ²⁰ https://www.instagram.com/reel/Cvkrt1pgM0x/?utm_source=ig_web_copy_link&igshid=MzRlODBiNWFiZA== (Accessed September 6, 2023).

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Bainbridge Island, Washington 98110-2450, and with no member domiciled in New Jersey.²⁴
AURA ~~operates~~operated as a wellness supplements and healthcare solutions software business.
AURA was closed in February 2024, as no investors were willing to make investment due to Defendants' campaign of misrepresentations and lies about Plaintiffs.

2. Ms. Jevremović, an individual, is a resident of the State of California. Ms. Jevremović is the founder and CEO of AURA. She identifies her address as: c/o Neville Johnson, Johnson & Johnson, LLP, 439 North Canon Drive, Suite 200, Beverly Hills, California, 90210 because she and her family have been harassed and received ~~harassment and threats in connection with~~from third parties as a result of the claims in this matter, ~~and because her~~ Her home address was disseminated (and unknown third parties ~~have~~ attempted to gain entry while the family was home), ~~Jevremović~~. She and her family ~~relocated were forced to relocate~~ their residence ~~multiple times and hired,~~ more than once, and were forced to hire a 24-hour security to guard their home. Ms. Jevremović thus respectfully seeks to avoid providing~~therefore has not provided~~ her California address in court filings, so she will not be forced to relocate, yet again.

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3. ~~Defendant Brittany~~Ms. Courville is an individual who resides ~~at 10 Teak Lane, in~~ Princeton, New Jersey, ~~08540, and~~ operates the various "That Surprise Witness" social media channels, and formed the Entity Defendants.

~~4. Defendant Prem Benipal is an individual who resides at 10 Teak Lane, Princeton, New Jersey, 08540, and has financially supported Courville's activities on her various "That Surprise Witness" social media channels and has himself appeared on the "That Surprise Witness" podcasts with Defendant Courville, and is involved with the operations of the Entity Defendants.~~

20. ²⁴~~See Docket Nos. 28, 39.~~

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5.4. ~~Defendant “That Surprise Witness TV LLC”~~The Entity Defendant was formed in New Jersey, under file number 450708640, on September 30, 2021, to carry out the activities of Ms. Courville ~~and Benipal~~ on the various “That Surprise Witness” social media ~~outlets~~channels.

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JURISDICTION AND VENUE

6.5. ~~Subject matter~~This Court has jurisdiction ~~is appropriate~~pursuant to this Court ~~under~~ 28 U.S.C. §-1332, because complete diversity exists amongst the parties and the amount in controversy ~~far~~ exceeds ~~the jurisdictional minimum~~\$75,000.

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7. ~~Venue is appropriate in this District under 28 U.S.C. § 1391(b)(1), (b)(2), and (c)(1) because Defendants reside in this District and published a substantial number of actionable statements to the Internet from this District.~~

~~ALLEGATIONS COMMON TO ALL CAUSES OF ACTION~~

8. ~~Defendant Courville is a New Jersey attorney, licensed in 2021 after graduating from The University of Pennsylvania School of Law in 2020. Courville worked at Winston Strawn briefly before she and the firm parted ways over Courville’s use of social media. On her LinkedIn profile, describes her profession as “Legal Commentary on YouTube/Social Media Law.”~~

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9. ~~At all relevant times, Defendant Benipal has provided financial support and acted as a de facto producer for various “That Surprise Witness” social media channels—and has himself appeared on the “That Surprise Witness” YouTube with Defendant Courville on numerous occasions and personally made false or misleading statements regarding Jevremović.²²~~

10. ~~Both Individual Defendants have, on information in belief, acted in coordinated~~

21. ²² See <https://www.youtube.com/watch?v=5EPVSf8KdIo> (Accessed September 7, 2023) (i.e., at 10:07 “Had [Jevremović] left Amanda alone, Amanda might be alive today...”.)

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~~efforts to carry out the business of the Entity Defendant.~~

~~11.1. In July 2020, Courville began to affiliate herself with the “Free Britney” movement, which criticized the institution of a conservatorship on celebrity musician Britney Spears. Courville uses variants of the handle “That Surprise Witness” on her various social media accounts. Courville reported becoming “obsessed” and using her newfound “legal expertise” to interpret the associated law, pleadings, and court opinions and orders. She spread this information online via videos, photos, and text commentary. As the “Free Britney” movement gained mass media attention, Courville was invited to give interviews as an attorney. Courville gathered hundreds of followers and viewers during the time that she gave commentary in connection with the Britney Spears conservatorship.~~

~~12. However, after Britney Spears’ conservatorship was terminated, Courville began to receive less attention, and fewer followers and viewers on her various “That Surprise Witness” social media handles. With her followers/viewers in the mere hundreds following the end of the Spears conservatorship, Courville needed to look for other celebrities and social media personalities that she could latch onto, to siphon off viewership and followers. Courville found the perfect combination of entities to tether “That Surprise Witness” to — with Margera (celebrity), Jevremović (entrepreneur with social media footprint), and AURA — Jevremović’s wellness supplements and healthcare solutions software business that had been generating a lot of attention.~~

NATURE OF THE CASE

6. Ms. Jevremović has two sisters who have experienced mental health crises starting from their early twenties. As Ms. Jevremović helped to take care of her sisters, she became familiar with the difficulties of navigating the complexities to get the medical care for mental illness treatment, and to obtain health insurance coverage for inpatient and outpatient treatments.

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7. As a result, Ms. Jevremović became inspired and decided to pursue a career in the management of mental illness, using what she has learned to help those who struggle with mental illnesses.

13-8. In 2019, Ms. Jevremović founded AURA to help individuals suffering through mental health crises, including addiction. AURA was founded to use technology to scale affordable, high-quality mental health treatment services. The Company was founded AURA intended to support mental health professionals using theits proprietary technology to track patientthe progress of people undergoing mental health treatment in various ways, inter alia, by recording and analyzing biometric data and providing the information to treatment providers from therapy sessions, connecting patients to therapists via telehealth, guiding users through grounding exercises and coping strategies, providing instructions in mindfulness and meditation, and using virtual reality (a.k.a. "VR") to, e.g., assist with exposure therapy, a technique guided by licensed therapists to extinguish an anxiety response. The CompanyAURA also producesproduced vitamins/supplements for brain health and mood support and has explored various other means of using technology to enable better health outcomes.

9. Ms. Jevremović made tremendous efforts to get AURA off the ground by, among other things, speaking at public and private universities and mental health forums.

10. One of Ms. Jevremović's appearances was on a series of videos produced for a YouTube Channel, Soft White Underbelly ("SWU"), run by Mark Laita, a commercial photographer.

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11. Mr. Laita interviews “people who are frequently invisible in society—the unhoused, the sex worker, the chronic drug user, the runaway, the gang member, the poor and the sick.”²³

12. In or around July 2020, Ms. Jevremović first appeared on SWU in an interview to discuss her connection with mental health and the company she founded – AURA.

13. Due to Ms. Jevremović’s efforts, AURA developed a community of adherents, and it has succeeded in garnering an initial round of investor funding for its development and launch. By or around March 2022, AURA has received \$1.5 million investment and was valued at \$10 Million dollars.

14. Through AURA, Ms. Jevremović supplied mental health assistance tools to numerous individuals clinics and ambulatory facilities, free of charge, in order to receive feedback, refine her tools, and develop a viral, word-of-mouth buzz surrounding the product. To that end, AURA had previously provided some services without charge to certain celebrities, influencers, and persons in the public eye—as well as individuals with no public presence as a community social service. Plaintiffs had been AURA was a successful and growing business in this regard burgeoning startup, until Ms. Courville began to leverage the “That Surprise Witness” treatment against created Ms. Jevremović and AURA, connecting scandals from Courville’s new ersatz villains.

15. Ms. Courville is a New Jersey attorney, licensed in 2021 after graduating from The University of Pennsylvania School of Law in 2020. Ms. Courville worked at Winston Strawn LLP, briefly, before she and the firm parted ways over Ms. Courville’s use of social

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²³ [https://en.wikipedia.org/wiki/Soft_White_Underbelly_\(YouTube_channel\)](https://en.wikipedia.org/wiki/Soft_White_Underbelly_(YouTube_channel)) (Accessed October 11, 2024.)

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media. Ms. Courville describes her profession on her LinkedIn Profile as “Legal Commentary on YouTube/Social Media Law.”

~~15.16.~~ On ~~or about~~ September 20, 2021, ~~Ms.~~ Courville ~~and Benipal~~ formed “That Surprise Witness TV LLC” in New Jersey with file number 0450708640.²⁴.

17. Ms. Courville ~~and Benipal have co-~~hosted many of ~~their~~her broadcasts ~~together~~ and otherwise collaborate to carry out through one of her YouTube Channel, That Surprise Witness TV.²⁵

18. Beginning in February 2022 and through to date, Ms. Courville has posted hundreds, if not thousands, of videos or Instagram posts defaming Ms. Jevremović.

19. A large number of Ms. Courville’s individual actions in support of dedicated followers, people who call themselves “that Surprise Army,” have heard Ms. Courville’s calls to “make noise,” and have targeted, harassed, doxed, and cyberstalked Ms. Jevremović, and everyone and everything associated with Ms. Jevremović.

~~16.20.~~ Ms. Jevremović’s life has been turned upside down by Defendants’ videos and posts, as well as the Entity Defendant.²⁶ relentless harassment, doxing, and cyberstalking by Ms. Courville and her followers.

21. As a result of the wrongful conduct of Ms. Courville, Ms. Jevremović has lost “everything.”

22. AURA became defunct after Ms. Courville started publishing defamatory statements, and eventually, had to be closed around February 2024, because investors were

22. ²⁴ <https://www.njportal.com/DOR/BusinessNameSearch/Search/EntityId> (Accessed September 5, 2023).

²⁵ <https://www.youtube.com/@ThatSurpriseWitness> (Accessed October 11, 2024.)

23. ²⁶ https://www.instagram.com/p/CvHzNuqAV67/?utm_source=ig_web_copy_link&igshid=MzRIODBiNWFIZA== (Accessed September 6, 2023). See

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not willing to invest in AURA and no longer was generating sufficient revenue from the sales of supplements.

23. As a result of Ms. Courville's wrongful acts, Ms. Jevremović has been unable to find consistent employment, because potential employers have been dissuaded from hiring her because any Google search reveals Ms. Courville's false and defamatory statements.

24. Ms. Jevremović's mother lost her job as a Software Engineer, after thousands of people used the information released by Ms. Courville to harass Ms. Courville's mother and make calls to her employer.

25. Ms. Jevremović's husband has also been the target of Defendants' social media campaigns. Ms. Courville published Mr. Jevremović's and his family's information through her platforms, resulting in the harassment of Mr. Jevremović and his family. As of October 2024, Mr. Jevremović and Ms. Jevremović are in the process of finalizing their divorce – yet another result of Defendants' wrongful conduct.

ALLEGATIONS COMMON TO ALL CAUSES OF ACTION

26. In July 2020, Ms. Courville began to affiliate herself with the "Free Britney" movement, which criticized the institution of a conservatorship on celebrity-musician Britney Spears. Ms. Courville used variants of the handle "That Surprise Witness" across her social media accounts. Ms. Courville reported becoming "obsessed" and using her newfound "legal expertise" to interpret the associated law, pleadings, and court opinions and orders. She spread information online via videos, photos, and text commentary. As the "Free Britney" movement gained mass media attention, Ms. Courville was invited to give interviews as an attorney. Ms. Courville gathered hundreds of followers and viewers during the time that she gave commentary in connection with the Britney Spears conservatorship.

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27. However, after Britney Spears' conservatorship was terminated, Ms. Courville began to receive less attention and had fewer followers and viewers across her various "That Surprise Witness" social media handles. With her followers/viewers in the mere hundreds following the end of the Spears conservatorship, Ms. Courville needed to look for other celebrities and social media personalities that she could latch onto to build her own viewership and followers. Ms. Courville found the perfect combination of entities to tether "That Surprise Witness" to—with Mr. Margera (a celebrity), Ms. Jevremović (an entrepreneur with a social media footprint), and AURA.

—MS. COURVILLE SPREADS FALSE STATEMENTS REGARDING

I. **DEATH OF MS. JEVRMOVIĆ'S INVOLVEMENT WITH AMANDA RABB**

28. One such recipient of AURA's free of charge services was Amanda Rabb ("Rabb"), an unhoused, drug-addicted woman residing in Los Angeles' notorious Skid Row who turned to sex work to fund her addiction. AURA provided \$250,000 to be used by Rabb for a—In or around late July, 2020, Ms. Jevremović appeared for an interview with Mr. Laita on SWU.²⁷ During that interview, Ms. Jevremović said that she was starting a scholarship program, through a nonprofit entity she formed, Jevremović Institute of Behavior and Brain Sciences ("JIBBS"), by which the recipient would receive one-year of mental health treatment (including detoxification), seven months of in-patient residential care, three months of full-time out-patient treatment while residing at a sober living facility, and two months of job placement training and reduced therapy to gradually integrate Rabb back into society as a productive, healthy member, free of charge.

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²⁷ <https://www.youtube.com/watch?v=b0twUppY6Z4&t=40s> (Accessed October 18, 2024.)

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29. At the end of that interview, Ms. Jevremović proposed that the first recipient of that scholarship would be one of the people that Mr. Laita had interviewed.

30. On or around August 1, 2020, Ms. Jevremović's interview was released on SWU. Some viewers commented under that interview that they believed Amanda Rabb ("Ms. Rabb") could be qualified as the first recipient.

31. Ms. Rabb was an unhoused, drug-addicted, woman residing in Los Angeles' notorious Skid Row, who turned to sex work to fund her addiction. In or around July 2020, Ms. Rabb was in jail for assaulting her father, Larry Rabb.

32. After having seen those comments, discussing the issues with Mr. Laita, and getting to know more about Ms. Rabb, Ms. Jevremović decided to select Ms. Rabb as the first recipient of the scholarship.

33. In or around August 2020, Ms. Jevremović started working with Mr. Rabb and Ms. Rabb's public defender to help Ms. Rabb obtain the treatment she needed for her substance abuse and mental illnesses.

34. In or around November 2020, the Court granted the petition for Ms. Rabb to receive treatment. The two treatment facilities where Ms. Rabb later received treatment, Hathaway Recovery Center and Desert Hope Treatment Center ("Desert Hope"), were not in any way owned or controlled by Ms. Jevremović. While Ms. Jevremović connected Ms. Rabb with those treatment centers, Ms. Jevremović and AURA did not, and could not, control the kind of treatment that Ms. Rabb received in the treatment centers.

35. Since AURA provided its products to the two treatment centers where Ms. Rabb received treatment, Ms. Rabb was also given the option to use AURA's products at no cost in conjunction with her treatment and therapy under the supervision of health care

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professionals. Ms. Jevremović personally funded the majority of Ms. Rabb's treatment, including drawing \$212,500 from a personal line of credit, supplemented by \$37,241 in donated funds.

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~~18-36.~~ Tragically, on Sunday, May 9, 2021, staff at ~~the Desert Hope Treatment Center ("Desert Hope"), where Rabb was receiving treatment (a treatment center not in any way controlled or operated by AURA or Jevremović) found~~ Desert Hope, found Ms. Rabb unresponsive in her bed and unsuccessfully performed CPR. When an AURA employee contacted the Clark County Coroner's Office, requesting information regarding Ms. Rabb's death, Desert Hope relayed to AURA and Ms. Jevremović that Ms. Rabb only had Tylenol in her system—a fact that was verified by a representative of the Clark County Coroner, Dr. Paul Uribe. Dr. Uribe added that Ms. Rabb's death resulted from natural causes, likely from multiple causes including physical trauma previously endured while abusing illicit substances and harm caused directly by the substances she had formerly abused. However, Ms. Rabb's formal autopsy report states that she died from cardiac arrhythmia with hypertension, obesity, and schizophrenia as contributing factors. ~~Courville conveniently left out that Jevremović made two separate podcast appearances, on Soft White Underbelly [published on Sep 9, 2022] and No Jumper [published on Sep 28, 2022], to clarify that the information Jevremović was based on conflicting information received from Dr. Uribe.~~

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~~19.~~ It is not a coincidence that Ms. Courville launched her campaign of lies and misinformation surrounding ~~the Rabb~~ Ms. Rabb's tragedy, around the time that Ms. Jevremović became involved as a court-appointed guardian to seek to help Brandon Margera ("Bam" as he is referred to by fans, or hereinafter "Mr. Margera") in his fight with addiction. ~~Some of Margera's unsavory associates such as Beedle and Pingor egged on Courville's efforts as a vigilante~~

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~~muckraker. These associates did not want to see Margera get better—these desultory individuals wanted to continue to take advantage of him financially and to borrow on Margera’s fame—and they urged Courville to amplify her false claims to further these ends.~~

~~20-37. So it was that Courville’s thirst for online stardom was wedded with a deliberate effort to destroy Jevremović and AURA. Courville’s campaign against Jevremović and AURA was amplified at the urgings of Beedle and Pingor, who sought to wild Courville’s influence to punish Jevremović for trying to help Margera in his battle with the demons of addiction.~~

~~24-38. Defendants’ blitz of false statements regarding Ms. Jevremović and AURA, analyzeddiscussed in detail below, began in February 2022 and has continued through September 2023, a modern media manipulation that has been pervasively toxic and wide rangingtoday. While Defendants’ social media blackmail effort began impugning withMs. Jevremović and AURA by making false suggestions that Ms. Jevremović had played some part in Ms. Rabb’s cause of death, the media offensive has expanded to accusing ofMs. Jevremović of numerous additional humiliating falsehoods. See Count I, infra. Working Defendants’ social media adherents – “That Surprise Army” – into a dangerous frenzy, with Courville’s adherents now labelling themselves “That Surprise Army”, the crusade has escalated to dangerous cyber-harassment and doxing to intimidate Ms. Jevremović into, among other things, dropping this lawsuit andto gain clicks with fear mongering, which has increasingly crossed over from online commentary into real world effects that have caused a well-founded fear in Ms. Jevremović and her family for their personal safety.²⁸~~

24. ²⁸ See, e.g., *Hate Speech on Social Media: Global Comparisons*, COUNCIL FOR FOREIGN RELATIONS, at <https://www.cfr.org/backgrounder/hate-speech-social-media-global-comparisons> (“Users’ experiences online are

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~~22. All the while, Defendants have callously profited from this behavior in the form of advertising revenues.~~

~~COURVILLE SPREADS FALSE STATEMENTS REGARDING~~
~~I. JEVREMOVIĆ'S INVOLVEMENT WITH BAM MARGERA~~

~~23.1. Celebrity entertainer Margera and his wife, Nicole Boyd Margera ("Boyd Margera"), took an interest in AURA in the Winter 2020. Margera has starred in blockbuster Jackass movies and popular television programs. Margera fought a longtime battle with substance abuse and witnessed numerous members of his inner circle fight addictions over the previous two decades. Because of his background, Margera and Boyd Margera initially sought to provide their support to Plaintiffs' efforts to mediate addiction and improve related health outcomes. However, when Margera proved susceptible to multiple relapses in his battle with addiction, Margera's family approached Jevremović for intervention assistance.~~

~~24.1. On or about June 7, 2021, an Arizona court imposed a one-year temporary guardianship over Margera in connection with his diagnosed medical issues. When Margera's family and friends implored Jevremović to serve as Margera's temporary guardian, Jevremović agreed and took on the responsibility for overseeing Margera's treatment, which was put into effect by Court Order, with no connection to his financials or other aspects of his life. Indeed, despite the fact that the Jevremović was statutorily permitted to collect reasonable sums for her services as guardian, Jevremović has received no compensation whatsoever,~~

~~mediated by algorithms designed to maximize their engagement, which often inadvertently promote extreme content. Some web watchdog groups say YouTube's autoplay function, in which the player, at the end of one video, tees up a related one, can be especially pernicious. The algorithm drives people to videos that promote conspiracy theories or are otherwise "divisive, misleading or false," according to a Wall Street Journal investigative report. "YouTube may be one of the most powerful radicalizing instruments of the 21st century," writes sociologist Zeynep Tufekci." (Accessed September 1, 2023.)~~

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~~directly or indirectly, as Margera's guardian. Rather, Margera's father has been assisting Margera in managing his finances for many years at Margera's request, and Jevremović's appointment as a temporary guardianship never touched upon Margera's money in any way.~~

~~25.1. After the court ordered guardianship terminated, Margera requested that Jevremović continue to serve as his "Health Care Agent," a role in which she assists Margera with his medical care related to his mental health treatment and recovery.~~

~~26.1. After learning that Jevremović was involved in Margera's recovery, Courville began publishing videos, photos, and text commentary regarding Margera, labeling her publications "#FreeBam," a reference to Margera's stage name, "Bam."~~

~~27.1. Courville began with baseless assertions that Margera's family and Jevremović manipulated a court imposed guardianship as a tool to access Margera's assets, and that Jevremović is committing and assisting in the commission of criminal acts and that Jevremović is dishonest and promulgates lies.~~

~~28.1. At the same time, on a parallel front of Defendants' concerted media campaign, Courville manipulated the background of facts surrounding the Rabb tragedy, and published videos, photos, and textual commentary in which she falsely accused Jevremović of criminal acts and dishonesty.~~

~~29.1. Defendants' statements become so prolific that they all but wiped any legitimate results regarding Jevremović and AURA from the first few pages of Google search results regarding either Plaintiff. Defendants directly disrupted AURA's second round funding, causing potential investors actively involved in funding discussions to retreat.~~

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~~30. Courville's false and misleading statements about Plaintiffs have directly interfered with AURA's business and caused deep financial disruption to Jevremović, directly resulting in order cancellations and the withdrawal of marketing affiliates.~~

~~I. **ACTUAL MALICE**~~

~~31. Courville knew and ignored the fact that no evidence demonstrated Jevremović to be dishonest and knew and ignored the fact that no evidence demonstrated Jevremović to be a criminal, because her true motivations were to create a smear campaign that would increase views, divert Jevremović from effectively acting as guardian to Margera, ruin Jevremović's business, and eventually seek revenge on Jevremović for filing this lawsuit.~~

~~32. At least at the outset, Courville had a preconceived story line, i.e., that Jevremović must be acting improperly, and Courville purposefully twisted and misrepresented information in whatever manner would accomplish her purpose of dissuading Jevremović from acting as a guardian for Margera.~~

~~33. That purpose changed over time to a more generalized goal of destroying Jevremović and AURA at any cost, out of an obsessive interest in Jevremović that developed over the course of the conduct.~~

~~34. Defendants also purposefully sought to reap the benefits that disinformation and online harassment have in the form of increased viewership and followers for Defendants' social media channels.~~

~~35. Courville was aware that her statements of fact were untrue based on their inherent improbability such as outlandish and unfounded assertions that Jevremović is involved in human trafficking.~~

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~~36. Courville took steps to deliberately avoid learning the truth regarding Jevremović despite the fact that such information was available to her. For instance, in her most viral video titled “Virtual Reality Hell”, Courville asserts that Rabb’s father was a molester eight times and suggests that Jevremovic was working with a molester to coordinate Rabb’s treatment²⁹, while at the same time, aware that Rabb had come out to clear her father’s name before her tragic death.~~

39. Courville specifically When it comes to disseminating misinformation regarding Ms. Jevremović’s and AURA’s help with Ms. Rabb, Ms. Courville created a preconceived storyline. Ms. Courville initially claimed Plaintiffs conspired with Ms. Rabb’s father, Larry Rabb, and Mr. Laita, to put Ms. Rabb in jail. Ms. Courville further claimed that Ms. Jevremović and AURA conducted experimental treatment on Ms. Rabb, against Ms. Rabb’s will. And, Ms. Courville claimed that Plaintiffs caused, and then lied about, Ms. Rabb’s death.

40. Ms. Courville fabricated her eye-catching story by portraying everyone around Ms. Rabb as villains. She published the story through her social media platforms, including, but not limited to, the most viral video on her YouTube channel, called “Virtual Reality Hell: The Amanda Rabb Story,”³⁰ which was streamed live on July 21, 2022, and is still accessible online, today.

41. The video was published through her YouTube channel: BJ Investigates.³¹ Ms. Courville describes her BJ Investigates Channel as follows:

25.

²⁹

https://www.youtube.com/watch?v=xdfvYfuEUsA&list=PLO9hzkgACQ1yoJ_RPLakmoyil7pb84_Uq&index=2
³⁰ <https://www.youtube.com/watch?v=xdfvYfuEUsA> (Accessed October 14, 2024.)

³¹ <https://www.youtube.com/@bjinvestigates> (Accessed October 11, 2024.)

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BJ sets off to uncover the TRUTH behind some of the biggest scandals in History. No matter what that truth may hold...

37. —Ms. Courville later made a series of videos under the name “Virtual Reality Hell: The Amanda Rabb Story” and posted that her intent in pursuing AURA was specifically “trying to stop [AURA] before it even gets off the ground.”³²

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38. —Defendants’ videos air advertisements from which they personally profit. Thus, Defendants are incentivized to publish and disseminate shocking and untrue materials³³, materials regarding celebrities, and other materials designed to maximize the views received by the commercials that play during their videos.

39.42. Courville further solicits and collects donations directly from viewers during her live broadcasts via YouTube, and Courville operates a site to solicit donations on gofundme.com that has generated \$48,108 in donations thus far.³⁴ Courville has a Patreon account³⁵ (an organization that provides users tools with which to fundraise) where she has generated paying subscribers, and where Courville solicits additional funds for in depth “investigations” and videos in furtherance of her campaign. Defendants promote branded “them on both her channel of That Surprise Witness TV” merchandise, deriving income from their activities.³⁶ Defendants derive income via false, misleading and defamatory statements, that also serve to generate more buzz and more viewers, and BJ Investigates.

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26. ³² @That Surprise Witness, Instagram video, at time stamp 7:23 <https://www.instagram.com/p/Ca2DuTfqZw/> (Accessed September 8, 2023.)

27. ³³ <https://news.mit.edu/2018/study-twitter-false-news-travels-faster-true-stories-0308> (Accessed September 1, 2023) (“[F]alsehood diffuses significantly farther, faster, deeper, and more broadly than the truth, in all categories of information, and in many cases by an order of magnitude.”)

28. ³⁴ <https://www.gofundme.com/f/facts-aint-defamation-fund> (“Facts Aint Defamation Fund”).

29. ³⁵ <https://www.patreon.com/thatsurprisewitness/posts> (Accessed August 20, 2023.)

30. ³⁶ <https://thatsurprisewitness.com/products/facts-aint-defamation-black-hoodie> (Accessed September 1, 2023.)

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40. — On July 15, 2022, Plaintiffs contacted Courville in writing to demand retraction of defamatory statements. To the extent Courville disclaimed any of her defamation, her attempts were patently pretextual and obviously insincere. On In a July 2221, 2022, Plaintiffs again contacted Courville in writing to identify further defamatory statements and to demand their retraction. No retraction issued and instead, Courville issued retaliatory false claims that suggested Margera was an investor in AURA³⁷ — which has never been true.

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41. — Courville and Benipal's doxing and harassment goes far beyond any sort of alleged social commentary, and on information and belief, is instead motivated by a desire to bring down Jevremović at any cost, even if it means exposing Jevremović to physical harm.

42. — This conduct has forced Jevremović to file police reports in New Jersey, California, and Oklahoma — and the LAPD Threat Management Unit is currently investigating Courville's actions as potentially criminal instances of stalking.

43. — Jevremović was forced to apply for a Restraining Order in California based on the actions of Courville's followers after they were armed with Jevremović's address, and as a result, Courville is subject to a Preliminary Restraining Order (attached as Exhibit 1), which includes an Order to Cease further social media posting about the protected parties (Jevremović, her sister and Jevremović's husband) with a hearing scheduled for September 25, 2023 to determine if a permanent restraining order will issue on the basis of Courville's malevolent conduct.

31. ³² <https://www.youtube.com/watch?v=JbM360M98Ew&t=3s> (Accessed September 8, 2023.) (at Time Stamp 36:45-37:06: "Question whether that is ethical or appropriate for someone [Margera] who is basically an investor in your business [AURA] and now you put them under a conservatorship like I don't know about the actual laws behind that but that doesn't seem appropriate that you could be the someone's guardian or conservator and they have purchased a stake in your business".) — Margera has never been an investor in AURA.

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~~WITH INTEREST IN DEFENDANTS' SOCIAL MEDIA CHANNELS
WANING, COURVILLE HAS TURNED TO INCREASINGLY EXTREME
ONLINE BEHAVIOR TO MAINTAIN VIEWERSHIP AND FOLLOWERS~~

44. Additionally, it would seem that Defendants have resorted to an unabashed campaign of doxing and cyber harassment in attempts to intimidate Jevremović and prevent Jevremović from maintaining this lawsuit, which was a goal stated by Courville in a YouTube video.³⁸

45. Courville's intent to seek to get Jevremović to drop this lawsuit has been a pervasive theme in the past year with Courville doxing even Jevremović's attorney, providing Neville L. Johnson's image in connection with her video criticizing the lawsuit³⁹:



46. Ms. Courville's unlawful activities have further evolved into a personal obsession with Plaintiff, and continuously increasingly disturbing incidents of harassment and doxing.

32. ³⁸June 27, 2023 YouTube Video, at <https://www.youtube.com/watch?v=Vh6j4YHlxoE>, at 3:45-4:39 (Accessed September 8, 2023.)

33. ³⁹<https://www.youtube.com/watch?v=JbM360M98Ew&t=3s> (Accessed September 8, 2023.)

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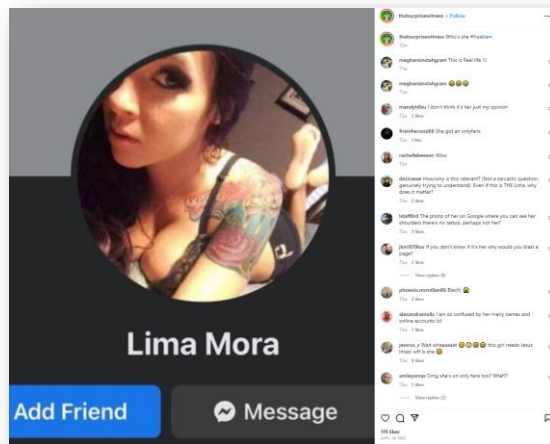
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47. Over the course of nineteen months of harassment, the Defendants have caused to be published over 300 videos across various forms of social media that are about Jevremović, with a total of 2,802+ minutes (46.7 hours), 8,000,000+ views across YouTube, Rumble, Instagram, Twitter and TikTok, and with over 1000 posts to Instagram and Tiktok about Jevremović. This does not include hundreds of other posts on Instagram and other forms of social media.

48. In one especially humiliating post on April 22, 2022, Defendants caused to be published a photograph⁴⁰ on the @ThatSurpriseWitness Instagram handle, falsely communicating that Courville had found an OnlyFans⁴¹ page for Jevremović—a profile page which links to pornographic films and photographs that are not Jevremović, as pictured below:



34. ⁴⁰
https://www.instagram.com/p/CeiejDiFsTl/?utm_source=ig_web_copy_link&igshid=MzRlODBiNWFlZA==
(Accessed September 9, 2023.)

35. ⁴¹ <https://www.complex.com/life/a/joshua-espinoza/what-is-onlyfans-explainer> (Accessed September 9, 2023).

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49. ~~Courville has amplified the harm⁴² to Jevremović from her campaign by including the false allegation regarding Jevremović's involvement in pornography, without any conceivable legitimate purpose except to harass and cause harm to Jevremović's reputation.~~⁴³

50. ~~Courville has at various times published to the Internet Jevremović's social security number, date of birth, unlisted home phone number, and three of Jevremović's unlisted home addresses⁴⁴, her family members' addresses, among many other pieces of highly personal and sensitive information in a coordinated and intentional doxing campaign.~~

51. ~~Additionally, Defendants' publication of Jevremović's sisters' addresses, resulted in the kidnapping and rape of Jevremović's sister, Dahlia, soon after the publication of Dahlia's otherwise private address.~~

52. ~~1. After being besieged in their home in Washington state by Courville's devotees, where Courville encouraged followers to "make some noise" directed towards Jevremović, Jevremović and her family relocated to California for their safety and have hired a round-the-clock home security detail.~~

53. ~~As recently as August 2023, Defendants' "@thatsurprisewitness" handle on Instagram included a post with comments that included Jevremović's home address (in Courville's moderated comments section), which has resulted in Jevremović's needing to~~

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36. ⁴² Mary Anne Franks, Unwilling Avatars: Idealism and Discrimination in Cyberspace, 20 Colum. J. Gender & L. 224, 255 (2011) ("[W]omen's unwilling online embodiment is in effect a double embodiment is one of the reasons that cyberspace harassment of women should be taken seriously. Women are frequently objectified in real life in ways that negatively impact their health, careers and general well-being, and are then re-objectified online in ways that also negatively impact their health, careers and general well-being. In the offline world, women are disproportionately "bodied" over-identified with their physical characteristics through their physical vulnerability relative to men and their historical, legal, and social objectification."); <https://www.pewresearch.org/internet/2021/01/13/the-state-of-online-harassment/> ("Women targeted in online harassment are more than twice as likely as men to say most recent incident was very or extremely upsetting.")

37.

38. ⁴⁴ See, e.g., <https://www.instagram.com/p/Cvm7JP5ABLB/?hl=en> (Accessed September 6, 2023).

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relocate and go into hiding, as drones were dispatched to her home and strangers began to appear near her front yard, lurking inexplicably, almost immediately upon this information being released on Defendants' "@thatsurprisewitness" Instagram handle.⁴⁵



54. Followers of Courville's began calling themselves "that Surprise Army" and plotting to "make some noise" at Courville's urging, including on one of Courville's posts featuring private bodycam footage of Jevremović's mother and Jevremović's sister.⁴⁶

55. After years of Defendants' assault on Jevremović, many previous collaborators of Jevremović's have fallen away. For example, Jevremović used to collaborate with Chloe Wilkinson on video projects relating to Wilkinson's "DissociaDID" social media channel and supported each other through difficult times, communicating through WhatsApp, for many years, until in August 2022, after Wilkinson became aware of Defendants' content regarding

39. ⁴⁵ <https://www.instagram.com/p/Cvm7JP5ABLB/?hl=en> (Accessed September 6, 2023) (the post has since been edited to remove the comment that included Lima's home address, but the screenshot above includes the post as originally listed).

40. ⁴⁶ https://www.instagram.com/reel/Cvkrt1pgM0x/?utm_source=ig_web_copy_link&igshid=MzRlODBiNWFiZA== (Accessed September 6, 2023).

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~~Jevremović, Wilkinson publicly denounced, ceased all future collaborations with Jevremović and blocked Jevremović on whatsapp based on Defendants' content. This caused Jevremović to lose a valuable friendship, and to lose further followers and viewers on her own social media channels, as a result of losing this valuable cross platform collaboration.~~

56. ~~Likewise, Courville's obsessive harassment and doxing has placed Jevremović in a false light, suggesting in turn that Jevremović is, by turns, a human trafficker⁴⁷, the cause of Amanda Rabb's death⁴⁸, a plotter out for Margera's money, a pornographic actress, and myriad other mistruths.~~

57. ~~43. Her followers tend to believe many of these items⁴⁹—especially because of Courville's background as a lawyer, where she has made numerous statements based on her "education, knowledge, and experience."⁵⁰—Indeed, many of Courville's most serious false accusations have been made without any "panda ears or bunny ears" and without any props like the "sparkly unicorn pinata."⁵¹ appearing as;~~

58. ~~After nearly two years of Defendants' hundreds of postings about Jevremović and AURA, the top search engine results for Jevremović and AURA are now almost all Defendants' false and/or intimidating social media content.~~

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41. ⁴⁷https://www.instagram.com/p/CeizM8YlOrq/?img_index=1 (Accessed September 8, 2023.)
42. ⁴⁸May 30, 2022 Instagram Post, at https://www.instagram.com/p/CeMD-1Aue7L/?img_index=1 (Accessed September 8, 2023) (falsely suggesting Jevremovich's "Last ward died in her care and she lied about the cause of death.")
43. ⁴⁹<https://www.socialmediatoday.com/news/new-report-shows-that-facebook-and-youtube-lead-the-way-as-key-sources-of-n/606877/> (Accessed September 8, 2023.)
44. ⁵⁰May 4, 2022 Instagram Post, at <https://www.instagram.com/p/CdJDKylMVI/> (Accessed September 8, 2023.) ("To clarify, I am a licensed attorney...")
⁵¹See <https://www.youtube.com/watch?v=xdFvYfuEUaA> (Accessed September 8, 2023); see also <https://www.gofundme.com/f/facts-aint-defamation-fund> See <https://www.youtube.com/watch?v=xdFvYfuEUaA> (Accessed October 10, 2024); see also <https://www.gofundme.com/f/facts-aint-defamation-fund> ("I am a lawtuber and independent journalist"); Cf. Court's August 10, 2023 Order at 13 ("In satirical spirit, Defendant can be seen wearing either panda ears or bunny ears while making her statements, while a sparkly unicorn piñata rests prominently in the background.")

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~~59.1. At the same time, Defendants' videos regarding Jevremović make up more than half of Courville's top ten most viewed videos, from which it can be inferred that Courville has operated with the awareness of the economic potential from distributing falsehoods about Jevremović.~~

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~~60. Accordingly, Defendants' activities have destroyed AURA's abilities to operate professionally or commercially and caused massive financial harm to both Plaintiffs.~~

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~~61. As a result of the foregoing activities alleged regarding Defendants, AURA has lost countless investors and revenues have declined to near null.~~

~~62. Defendants' activities have caused substantial and irreversible damage to Jevremović's career and reputation, and her career as an entrepreneur and healthcare activist has been nearly destroyed.~~

~~63. Defendants' activities have destroyed Jevremović's prior income from social media, which was substantial prior to Courville's siphoning off Jevremović's followers/viewers by way of the unlawful activities.~~

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~~(By Plaintiff Lima Jevremović against All Defendants)~~

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~~64. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 63 as though fully set forth in this paragraph.~~

~~65.1. On May 30, 2022, Courville published via Instagram the statement⁵²:~~

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~~Lima [Jevremović]. . . LIED ABOUT [AMANDA'S] CAUSE OF DEATH TO MILLIONS of people.~~

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⁵² https://www.instagram.com/p/CeMD-1Au07L/?img_index=1 (Accessed August 28, 2023.)
October 14, 2024.)

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~~66. This statement is defamatory as it expressly impugns Jevremović's honesty and is wholly false.~~

~~In this same statement, published alongside photos and videos of Jevremović at Disneyland with Bam Margera and his family,~~



~~44. In the video, Ms. Courville played a short excerpt of one of Ms. Rabb's six interviews with Mr. Laita, where Ms. Rabb had stated that her father was a molester.~~

~~67.1. While Ms. Courville refers to showed a short excerpt from a later interview that Ms. Rabb had with Mr. Laita in Jevremović as a "handler[] and trafficker[],"~~

~~68. This statement is defamatory as it characterizes Jevremović as a trafficker, and thus a criminal, which she is not.~~

~~69. On April 19, 2022, 2021, Ms. Courville published an image⁵³ of Jevremović reading Amanda's cause of death (as per the information obtained by an AURA employee from the Clark County Coroner) from a YouTube video to Instagram with the caption:~~

~~I requested the autopsy report and lma is lying in this video. There was NO evidence of traumatic injury. There was LOTS [sic] of medication in her system (not 'only Tylenol'). The cause of death has nothing to do with 'seizure disorder', but rather cardiac arrhythmia. I've chose not to disclose to her audience that Ms. Rabb stated during that very same interview, posted on [Instagram] about it.~~

45. ⁵³<https://www.instagram.com/p/CeiSZGpOyPH/> (Accessed August 30, 2023.)

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~~70. This is defamatory insofar as it falsely accuses Jevremović of dishonesty, whereas Jevremović in fact accurately conveyed the information that the Clark County Coroner had conveyed to AURA.~~

~~71.45. On April 19, 2022, Courville published photos⁵⁴ of Amanda Rabb's "Report of Investigation" record obtained from the Clark County Coroner, and Courville published comments stating: 2021, that Ms. Rabb cleared her father's name.⁵⁵~~

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~~Two of Lima's lies EXPOSED: (EXCLUSIVE AUTOPSY REPORT) 1. WAYY [sic] more than just Tylenol in her system (including cannabinoids [sic] and barbiturates) 2. Cause of death is NOT 'seizure disorder' or 'caused by beatings and rap[e]s' [sic], but rather, 'cardiac arrhythmia'. #AmandaRabb #FreeBam #LIARS.~~

~~72. These false statements are defamatory insofar as they impugn Jevremović's honesty.~~

~~73. On April 19, 2022, Courville published a video⁵⁶ of Jevremović reading Amanda's cause of death (as per the information obtained from the Clark County Coroner) from a YouTube video to Instagram. Courville commented on the video, stating:~~

~~So lima from @meetAURA BOLD FACE LIED to [Mr. Laita] and [YouTube] followers when she said Amanda Rabb's cause of death was 'seizure disorder'. I have reached out twice to [Mr. Laita] for comment, and he has ignored me. Why did lima lie?? #FreeBam #AmandaRabb.~~

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~~74. This false statement is defamatory insofar as it impugns Jevremović's honesty.~~

~~75.1. On April 3, 2022, Courville published an image⁵⁷ on Instagram which purports to list biographical information about Margera, including his putative net worth (\$20 Million). Courville commented on the image:~~

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46. ⁵⁴https://www.instagram.com/p/CeiRdYbuxUX/?img_index=1 (Accessed August 30, 2023.)
⁵⁵ <https://www.youtube.com/watch?v=rt9OoLSavKM&list=PLBEIBBdgAOAoTfxs3dbbBIwM3FR7vNJQA&index=12> (Accessed October 15, 2024.)

47. ⁵⁶<https://www.instagram.com/p/CeiQwHOO-Ux/> (Accessed August 30, 2023.)

48. ⁵⁷<https://www.instagram.com/p/Cb5b59wFxlq/> (Accessed August 30, 2023.)

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~~According to @distractify, [Margera] is worth \$20 million. Now who would have an incentive to want to control that money and who would be in a position to do so 🤔🤔🤔 but what do I know I'm just a eOnSpIrAcY tHeOrIsT 🤔🤔🤔 #FreeBam.~~

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~~— Another commenter states:~~

~~20 million now, soon to be much less, but it'll all be 'legit,'~~

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~~— to which Courville responds:~~

~~but a certain someone will have fresh lips, Botox, and a BBL watch.~~

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~~— Based on her other comments using the term “#FreeBam,” her audience would reasonably interpret Courville’s comments here to reference Jevremović — in fact, people did comment in response who understood the messages to reference Jevremović.~~

~~76. These statements are defamatory insofar as Courville falsely characterizes Jevremović as depleting Margera’s money rather than assisting with treatment for a substance abuse disorder. Such statements are defamatory as they falsely impute a motive to Jevremović, which most people would find condemnable.~~

~~46. On March 30, 2022, Courville published to Instagram an excerpt of a YouTube video⁵⁸ in which Jevremović and Larry Rabb, Amanda Rabb’s During a 12-minute interview with Mr. Laita, Ms. Rabb spoke fondly of her father, multiple times, including, but not limited to:~~

~~I mean I was tripping and the things that I accused my dad of in those videos is not true. I had schizophrenia. I had a mental illness where things I hear voices hallucinations all that. So my dad has done nothing~~

49. ⁵⁸<https://www.instagram.com/p/CbvTro1JLYk/>

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to hurt me. He's a great guy. He's always been there for me and I really love him. So I just want to put that out there.

Yeah my dad we talk three times a day. I mean he's just such a great guy. I mean I can't wait to leave here. We're probably going to travel around the world together, that's just being sarcastic. But we're probably going to do a lot of fun things together because he's like my best friend now. We talk like three times a day.

And

I miss my dad. I love him so much. He's my rock honestly.

47. Ms. Courville intentionally lied about, or at the very least recklessly disregarded, Ms. Rabb's relationship with her father, so that Ms. Courville could persuade her audience that Ms. Jevremović conspired with Mr. Rabb – who in Ms. Courville's viewers' eyes, is a molester – to put Ms. Rabb into jail.

48. Ms. Courville claimed, among other things:⁵⁹

So by July, Lima already knew about Amanda, and was working in concert with Amanda's father who she called a molester, and Mark Laita who was paying her admittedly, knowing to go buy crack with. And they all conspired to make sure that Amanda went to jail.

49. Her statement was and is false. Ms. Jevremović first found out about Ms. Rabb only after Ms. Rabb was already in jail. Ms. Courville did not provide any basis for her accusation.

50. Ms. Courville further claimed, among other things:

Mark and Lima conspired to force her and it was easier to choose Amanda as the victim of this coerced treatment because they already had Larry Rabb.

51. Ms. Courville falsely claimed that Ms. Jevremović and AURA chose Ms. Rabb to be the subject of AURA's experimental treatment, with the cooperation of Mr. Rabb, whom

⁵⁹ <https://www.youtube.com/watch?v=xdfvYfuEUa> (Accessed October 14, 2024.)

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Ms. Courville portrayed to her audience as a molester.

52. Ms. Courville additionally claimed, among other things:

Lima didn't tell the truth. Now we've caught her in two lies so far on the timeline. First of all, that the audience was somehow gonna help pick Amanda... Amanda was hand chosen because they had the cooperation of Larry Rabb. You need a family member.

53. Ms. Courville intentionally hid from her audience, or recklessly disregarded the truth that Mr. Laita specified that he recommended Ms. Rabb to be as the recipient of the scholarship program, due to Ms. Rabb's history, during his interview with Ms. Rabb on April 19, 2021:⁶⁰

Mr. Laita: Well all I can say is Lima is an amazing woman. Ms. Rabb: She is.

Mr. Laita: Because when she asked me who would I recommend for my chan. She wanted to do something for my channel. She would do this for and I recommended, you know, like you know maybe five or ten people.

Ms. Rabb: Yeah.

Mr. Laita: They would all have been good candidates but I said "or you can choose the hardest of all..."

Ms. Rabb: Right.

Mr. Laita: Which was you.

54. Ms. Courville further stated:

I operate in one absolute thing and that is truth. Lima didn't tell the truth.

55. ~~describe~~ Defendants' audience believed in Defendants' fabricated story as truth.

and praised Defendants for discovering the truth:



@thedallilama3143 1 year ago

Lima and her company "AURA" is a SCAM. She reminds me of the narcissistic "conservator" in the 2020 movie "I Care A Lot," who ends up attempting to scam the wrong old lady. All 3 of these people are monsters who helped to end Amanda Rabb.



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Reply

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⁶⁰ <https://www.youtube.com/watch?v=rt9OoLSavKM&list=PLBEIBBdgAOAoTfxs3dbbBIwM3FR7vNJQA&index=12> (Accessed October 15, 2024.)

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@teetee996112 2 years ago

BJ is calling out people who profit off of the suffering of others and deserves far more respect for her work



1.6K



Reply



@kbonvie 2 years ago

Look how panicked Lima looks at the part where Mark said he had been trying to put Amanda in a conservatorship!!! The timeline is everything. Great job BJ Investigate team



300



Reply

2 replies



@kbonvie 2 years ago

*Larry not Mark

56. On or about March 29, 2022, Ms. Courville, in her video called “Bam Margera Conservatorship | \$HOCK!NG UPDATES,” stated that Ms. Jevremović instructed Mr. Rabb to call the police and have Ms. Rabb arrested. Ms. Courville falsely called both Ms. Rabb’s arrest and Mr. Margera’s arrest in Florida a “setup,” and claimed that Ms. Jevremović conspired with others in both instances to force both Ms. Rabb and Mr. Margera into a conservatorship. Specially, Ms. Courville claimed:⁶¹

Now if y’all remember, what happened with Amanda in the Soft White Underbelly video, this that case is related to this one *because Lima is involved in both of them*. So how did they get Amanda in jail in that Soft White Underbelly case? Well, she attacked her dad, which they could be all lying about that, I didn’t see that. Did y’all see Amanda attack her dad? Because I didn’t. But allegedly Amanda attacked her dad and then her dad calls Mark Laita, the produce the YouTuber, Soft White Belly YouTuber and photographer. The dad calls and says hey Amanda just attacked me what should I do. *On Lima’s suggestion*, Mark Laita said you should call the cops and get her arrested. *Once Amanda was arrested, they put her into a conservatorship and put her forced her into rehab*. So let’s see if this looks familiar.

(emphasis added).

57. Defendants made the above statements, and other defamatory statements, with actual malice. During the April 19, 2021 interview, that Ms. Courville referenced and cited to

⁶¹ <https://www.youtube.com/watch?v=dYqBXwmKLxY> (Accessed October 15, 2024.)

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in her own video, Mr. Laita said to Ms. Rabb and the audience:⁶²

so so you, I think assaulted your dad and your dad called me that one night and said, "what do I do Amanda just assaulted me the police are here." And I said, I told your dad like, just put her in jail. She's going to walk the streets barefoot and and probably get killed eventually so putting her in jail for a month or two isn't gonna hurt her. So that's you went to jail and then from jail you went the court decided that you needed to do rehab for one year.

To which Ms. Rabb responded: "Right."

58. Mr. Laita did not mention Mr. Jevremović, whatsoever, in making the decision to put Ms. Rabb in jail. And Ms. Courville knew of it.

77-59. On March 30, 2022, Ms. Courville published on Instagram an excerpt of a YouTube video⁶³ in which Ms. Jevremović and Mr. Rabb, Amanda Rabb's father, described how they managed to transfer AmandaMs. Rabb from jail to a drug rehabilitation facility through the use of Court Ordered Treatment under California law. Pausing and speaking over the video at the one-minute and fifteen-second timestamp, Ms. Courville states that Amanda'sMs. Rabb's public defender is not supposed to: "help you push your scam conservatorship through."

—help you push your scam conservatorship through.

78. This statement is defamatory per se insofar as it accuses Jevremović of a scam with reference to attempting to impose an LPS conservatorship on Rabb; this imputes criminality or at least immorality and is thus defamatory.

⁶² <https://www.youtube.com/watch?v=r9OoLSavKM&list=PLBEIBBgAOAoTfxs3dbbBIwM3FR7vNIQA&index=12> (Accessed October 15, 2024.)

⁶³ <https://www.instagram.com/p/CbvTroIJLYk/> (Accessed October 15, 2024.)

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79. On ~~May 7~~ April 26, 2022, Ms. Courville published a photo⁶⁴ to Instagram picturing Margera's costars from his television show and movies performing a stunt, and Courville captioned the photo:

[PEOPLE] ... are mad that I'm uncovering a criminal conspiracy

— And

— #FREEBAM.

— She further published a comment on the photo stating,

— Let the #conspiracytheories roll #freebam.

80. These statements were defamatory as they falsely imply that Jevremović, as a person Courville repeatedly identifies as responsible for Margera's confinement, is a criminal and engaged in a criminal conspiracy.

81. On May 6, 2022, Courville published a picture⁶⁵ of Margera to Instagram, overlaid with an anonymous person's statement criticizing Courville's publications:

— the whole #freebam thing is so weird and i [sic] strongly believe that [Courville] is a conspiracy theorist. if [sic] she was an actual lawyer[,] wouldn't she actually be busy? sorry [sic] i'm [sic] not buying it

— Courville published a comment in response:

— I AM a conspiracy theorist. I have a theory that this is a criminal conspiracy. So they're right! #freebam.

82. This statement is defamatory as it implies that Jevremović is engaged in a criminal conspiracy with respect to her previous involvement with Margera which is false and misleading, and has caused harm to Jevremović.

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50. ⁶⁴<https://www.instagram.com/p/CdQOLU9QQxI/>

51. ⁶⁵<https://www.instagram.com/p/CdOTKe4OFcG/>

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83. On May 4, 2022, Courville published an image⁶⁶ to Instagram containing mostly text; the text is a republication of a comment previously made by Courville, which of relevance includes:

... I am a licensed attorney who believes [Margera]'s constitutional rights have been violated. Based on my education, knowledge, and experience, he has been set up by a group of criminal co-conspirators for financial purposes not in [Margera's] best interest. . . . #freebam SPREAD THE WORD.

84. This statement constitutes defamation insofar as it implies that Jevremović, as a person whom Courville repeatedly identifies as central in Margera's treatment, is engaged in a criminal conspiracy and is attempting to co-opt Margera's assets. Further, Courville encourages her audience to further publish her statements.

85. On May 4, 2022, Courville published an image⁶⁷ on Instagram regarding Margera, and a user, "pettyhearst," commented thereupon stating:

I've been a [Margera] fan for 20 years, and his parents are good people who want the best for their son. While I personally believe conservatorships are never the answer and forced treatment is harmful, if it was just them in charge[,] I would at least have peace of mind that there is no malicious intent. But they aren't in charge[;] Lima is, and she's a snake oil salesman with blood on her hands. She's clearly adept at manipulation, and I have no doubt she is manipulating [Margera's parents].

86. Courville published a reply directly to this statement expressing agreement:

bingo.

87. This statement is defamatory insofar as Courville affirmed the false statements made by the anonymous commenter, thus adopting those comments as her own. These statements assert that Jevremović is manipulating persons for her own gain (impugning Jevremović's honesty) and imply that Jevremović is not acting in Margera's interest, that

52. ⁶⁶<https://www.instagram.com/p/CdJHr4Yu7Wl/>

53. ⁶⁷<https://www.instagram.com/p/CdJDkylMVI/>

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~~Jevremović is responsible for Rabb's death ("blood on her hands" in conjunction with Courville's other defamatory statements with respect to Jevremović and Rabb, this is a reference to Jevremović allegedly being at fault for Rabb's death), and that Jevremović has malicious intent.~~

~~88. On April 27, 2022, Courville published on Instagram an image⁶⁸ showing a digital message sent to her in which Courville is criticized for spreading falsehoods (i.e., "Irresponsible videos with imagined facts can be very damaging to others"). Courville captioned the image:~~

~~—SUE ME~~

~~— and published a comment on the image, stating:~~

~~—The only facts that were imagined came from Lima Jevremović's lying ass mouth.~~

~~89. This false statement is defamatory insofar as it impugns Jevremović's honesty. Courville further published a comment to this image, stating:~~

~~—if telling the truth is 'damaging to others' and those others are criminals, SO BE IT.~~

~~90. This statement is defamatory insofar as it implies that "others" is Jevremović and thus falsely implies that she is a criminal (the "others" referenced is clearly a reference to Jevremović, in context).~~

~~91. On April 27, 2022, Courville published on Instagram another image⁶⁹ showing a portion of the message sent to her. Courville published a comment associated with the image that reads in relevant part:~~

54. ⁶⁸ <https://www.instagram.com/p/Ce3Ch4YLTyb/>

55. ⁶⁹ <https://www.instagram.com/p/Ce21n0lsp74/>

12.

~~Or is it maybe because the public record doesn't agree with the fake[,] imaginary tale surrounding Rabb's death that [the message sender] wants us to believe??.~~

~~92. This statement is defamatory as it impugns Jevremović's honesty by implying that she fabricated a "fake[,] imaginary tale" to mislead people. In a separate comment, Courville further answers a question about Jevremović's description of HIPAA's application to Rabb, stating:~~

~~because they lie.~~

~~93. This is defamatory as it is false and expressly impugns Jevremović's honesty.~~

~~94-60. On April 26, 2022, Courville published to~~ Instagram a ~~screenshot~~⁷⁰ showing the "gofundmeGoFundMe" donation page for Ms. Rabb's treatment, which then indicated that no new donations would be accepted. Ms. Courville commented on ~~this~~⁷¹ photo with the statement:

~~Thanks for taking down your fraudulent fundraiser~~ limaLima!

~~95. This statement is defamatory as it falsely imputes criminality to Jevremović, expressly accusing her of fraud.~~

~~96-1. On April 25, 2022, Courville published on Instagram an excerpt~~⁷¹ ~~from a Complaint previously filed by Margera against others affiliated with his television and film career. A commenter stated in response:~~

~~You discover so much more each days [sic] that goes by.. I don't trust any of them.. If this man does not come out of this [conservatorship,] they will eventually [k]ill him with prescription drug[s] or disguise street drugs as prescription drugs[;] who knows.. If [Britney Spears]~~

⁷⁰ <https://www.instagram.com/p/CcIUinJsWvQ/>
<https://www.instagram.com/p/CcIUinJsWvQ/> (Accessed October 21, 2024.)

56. ⁷¹ <https://www.instagram.com/p/CcxsX9HsR9H/>

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~~would not be out of this[,] she would prob[ably] be defald by now.. This
man need[s] to be saved and free now.. #freebam~~

~~— In response, Courville states:~~

~~— Ms. the plan is to end his life. I'm convinced of it. #savebam.~~

97. ~~This statement is defamatory insofar as it alleges that those involved in “the
plan” are seeking to kill Margera; in context with Courville’s statements regarding Jevremović
being central to Margera’s treatment, one can reasonably infer that Courville is falsely
referencing Jevremović as planning to kill Margera.~~

98-61. ~~On April 25, 2022,~~ Courville published ~~toon~~ Instagram a ~~screenshot~~⁷² showing
that the “Donate now” button was still present on the “~~gofundme~~GoFundMe” donation page
for ~~Ms.~~ Rabb’s treatment. ~~Ms.~~ Courville commented, ~~asking Gofundme:~~

~~can you return the funds that have been fraudulently collected from
donors on this fundraiser?~~

~~— and stated,~~

~~...~~

~~many people have reported this fraudulent fundraiser and your
organization has taken no action.~~

Elsewhere, ~~Ms.~~ Courville ~~states~~^{stated} that:

~~we’ve reported [fraud] a lot~~

99. ~~These statements are defamatory as they falsely accuse Jevremović of criminal
behavior namely, fraud.~~

⁷² ~~<https://www.instagram.com/p/CcxeH1hOK1d/>~~
~~<https://www.instagram.com/p/CcxeH1hOK1d/>~~ (Accessed October 21, 2024.)

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~~100. On April 19, 2022, Courville posted an image⁷³ comprising text with the tip line for human trafficking from the National Human Trafficking Hotline, and Courville commented: “#FreeBam.” Courville specifically highlighted the phone number and the text stating,~~

~~—REPORT A TIP with information on potential human trafficking activity.~~

~~101. Courville further added a second photo, depicting a cell phone call to a phone number with five minutes having elapsed, the implication being that Courville had called to report Margera as being trafficked to the National Human Trafficking Hotline. A commenter asks in response:~~

~~—There [are two] different numbers?!~~

~~—to which Courville answers:~~

~~—yeah[,] there’s a few[,] I called a different tip line[,] but you can call either one.~~

~~102. This is defamatory because Courville implies that Margera is being trafficked, a criminal act, and in the context of her other statements used in connection with the “#FreeBam” tag, it is clear that she views Jevremović as central to this effort. In the context of her statement that she has called to report Margera’s situation as human trafficking and in light of her explicit instructions to a commenter to call, Courville intends this statement to be understood sincerely.~~

~~103. On April 19, 2022, Courville published an image⁷⁴ on Instagram containing a short conversation between Courville and a commenter. The commenter accurately stated:~~

~~—[Margera is] not under a conservatorship[;] he’s under a guardianship—big difference.~~

57. ⁷³ <https://www.instagram.com/p/CeizM8Y1Oq/>

58. ⁷⁴ <https://www.instagram.com/p/CeibN0JOx89/> (Accessed September 8, 2023.)

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~~104. As recounted in the discussion of Margera above, he was subject to a guardianship imposed in Arizona, and at no relevant time has a conservatorship been imposed. Nonetheless, Courville invokes her credentials, suggests she holds expertise, again provides an inaccurate interpretation of the law, and solicits viewers for her advertisement supported videos:~~

62. Ms. Courville's viewers believe Ms. Courville's false accusations and multiple viewers have commented, among other things, that:



sarahmac406 129w

I can't say I'm surprised. This woman is a criminal and a con artist. It makes me sick that this is happening

4 likes Reply ...

and



sadouletthoff 129w

That's criminal.....

6 likes Reply

63. Ms. Courville reiterated her accusations and false statements this in the same video, at 18:15, when she stated:

~~are you a lawyer? Because I am. It's not different. It's exactly the same. Different states just call it different things. Please feel free to check out my Bam Margera playlist on YouTube for more info!~~

~~In response, a commenter remarked:~~

~~Every state is so different that I think these people use it to confuse people. I wonder if it would help if it was more uniform across the United States?~~

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~~—Courville, apparently drawing upon her self-avowed lawyerly expertise, explains:~~

~~—it's to confuse people so the criminals can keep crim[e]-ing.~~

~~105. This is defamatory insofar as, in the context of discussing Margera, it falsely states effectively that the guardianship system is a criminal tool, and thus by implication that Jevremović, as Margera's guardian, must be a criminal.~~

~~106. On April 19, 2022, Courville published on Instagram a screenshot⁷⁵ of a conversation between unidentified persons regarding Margera; Courville commented, describing "[L]ima [J]evremović" as an "alleged trafficker." On April 19, 2022, Courville published on Instagram screenshots⁷⁶ of excerpts from a tabloid story about Margera's recovery, with a section of the article highlighted. Courville commented on the screenshot regarding Margera's recovery, in relevant part, by stating: "#FreeDam" and "#EndHumanTrafficking."~~

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~~107. These statements are defamatory as they imply that Jevremović is trafficking Margera. While these statements might ordinarily be readily understood as hyperbole, Courville's repeatedly holding herself out as a legal expert and her repeated emphasis of her use of legal language in its technical sense would reasonably lead a significant portion of her audience to understand the implications of these statements literally.~~

~~108. On April 18, 2022, Courville published a screenshot⁷⁷ of a highlighted excerpt from an article discussing the application of Iceland law and whether Margera's and his wife's marriage is legally recognized. A commenter on this image asked:~~

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~~—where are his parents?~~

59. ⁷⁵<https://www.instagram.com/p/CeiJ3HsuFIx/> (Accessed September 5, 2023.)
60. ⁷⁶<https://www.instagram.com/p/CeiIldfukcw/> (Accessed September 1, 2023.)
61. ⁷⁷<https://www.instagram.com/p/Cef9UdxuHYe/> (Accessed September 1, 2023.)

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~~—to which Courville responded:~~

~~helping the criminals [sic] girl.~~

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~~109. This statement is defamatory insofar as Courville's constant association of Jevremović with Margera's treatment naturally leads Courville's audience to understand "girl" in this context to reference Jevremović; these false statements are defamatory insofar they assert that Jevremović is a criminal, which she is not.~~

~~110. On April 3, 2022, Courville posted a screenshot⁷⁸ of an excerpt of a celebrity tabloid article to Instagram, in which she highlighted a portion of the title stating, "Margera Used To Have A \$45 Million Net Worth"; Courville commented on the photo, saying:~~

~~I heard forced rehab is expensive... I learned that from Lima from @meetAURA. Who now has @bam_margera in a forced rehab. WhT are the chances!! That's just my conspiracy theory lol 😊 #FreeBam.~~

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~~111. By linking the cost of rehabilitation, as described by Jevremović, to the supposed depletion of Margera's net worth, Courville is falsely characterizing Jevremović as depleting Margera's money rather than assisting with treatment for a substance abuse disorder. Such a statement is defamatory as it falsely imputes a profit motive to Jevremović which most people would find condemnable.~~

~~112. On March 30, 2022, Courville published to Instagram a screenshot⁷⁹ of comments made to Instagram; a commenter asked:~~

~~forced incarceration, experimenting on homeless & celebrity cash cows to fund her treatment centers? If im [sic] wrong on anything[,] please [let me know.]~~

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62. ⁷⁸ <https://www.instagram.com/p/Cb5dJK4FXNI/> (Accessed September 8, 2023.)

63. ⁷⁹ <https://www.instagram.com/p/CbvFUFaOuoU/> (Accessed September 8, 2023.)

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—Courville responded:

~~I mean... that's my impression, so if you're wrong[,] I am too.~~

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~~113. Courville thereby explicitly adopted the commenter's false statements.~~

~~Jevremović does not engage in experiments on the homeless and has no treatment centers; further, the pejorative term "celebrity cash cows" implies that Jevremović is exploiting celebrities for money. Such false statements are defamatory as they indicate dishonesty and insofar as people hold low opinions of those who exploit others.~~

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~~114.1. On April 4, 2022, Courville published to YouTube a video entitled "What Happened to Bam Margera? EXCLUSIVE POLICE REPORT"⁸⁰ in which she defames Jevremović. At 27:39, Courville describes Margera's transfers between treatment facilities and states:~~

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~~Honestly, some of it looks criminal. Now I'm a lawyer, but what do I know. It looks criminal to me.~~

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~~115. This statement defames Jevremović insofar as Courville repeatedly identifies Jevremović as responsible for Margera's treatment, and insofar as Courville, invoking the authority she commands as a lawyer, describes aspects of Margera's treatment as criminal.~~

~~116. On July 15, 2022, Courville published to YouTube a video entitled "Bam's Guardian LASHES OUT | Breaks Silence on #FreeBam Reaction"⁸¹ in which she reacts to Jevremović's public statements addressing, *inter alia*, Courville's harassment ("the relentless harassment, leaking all of my private information all over the internet, threats to my family~~

⁸⁰ <https://www.youtube.com/watch?v=b3beCLgl6aw> (Accessed September 8, 2023; October 14, 2024.)

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⁸¹ <https://www.youtube.com/watch?v=5EPVSf8Kdlo> (Accessed September 8, 2023.)

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and clients, constantly reporting my social media accounts and businesses and the over 14,000 emails that have cluttered my inbox"). At 05:05 Courville states

— I also know Lima [is] a liar.

117. This is defamatory insofar as Courville expressly impugns Jevremović's honesty without basis.

118. Later in the same video, at 26:08, Courville addresses the discrepancy between Jevremović's description of Rabb's cause of death and the official autopsy report and states:

— [Jevremović] can't keep track of her story. And that's what happens when you lie; you have to keep track of the lies you told.

119. This is defamatory insofar as it expressly characterizes Jevremović's statements as lies, when in reality, Jevremović's alleged false statements emanated from an email with conflicting information which Jevremović read from in a video Courville cites as inaccurate.⁸² Clark County did not provide Jevremović with the complete autopsy report citing HIPAA law as the reason for not providing the full document which Courville somehow obtained and publicized in attempts to discredit Jevremović. In reality, Jevremović read from the information she was provided.

120. On July 8, 2022, Courville published to YouTube a video entitled "~~Bam's Family Breaks Silence on #FreeBam | Jess and April Margera SPEAK OUT~~"⁸³. At 6:10, she states:

~~I do not say theories without being very explicit that it is my opinion or my belief or my suspicion. I never say anything as if it is a fact when I don't know it to be a fact.~~

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65. ⁸² <https://www.youtube.com/watch?v=IQTPnbpsA1c> (Accessed September 8, 2023.)

⁸³ <https://www.youtube.com/watch?v=Nr3e0RKY6Ig> (Accessed September 8, 2023; October 14, 2024.)

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~~121. Courville thus emphasizes that her statements are accurate and factual. At 15:59, Courville describes herself as~~

~~— the woman who dared use her, volunteer her time to help [Marger] out of a literal human trafficking situation~~

~~122. This is defamatory insofar as it characterizes Jevremović's imposition of a guardianship as human trafficking, a crime. While such statements might ordinarily be susceptible to an interpretation as hyperbole, Courville disclaims hyperbole by use of the term "literal," and she makes clear that if she did not intend for this statement to be taken literally, then she would have been "very explicit that it is my opinion or my belief or my suspicion," and she would "never say [this statement] as if it is a fact if [she didn't] know it to be a fact."~~

~~123.1. On April 18, 2022, Courville posted a screenshot⁸⁴ of anonymous comments to Instagram, captioning the photo:~~

~~Looks like team con is planning to traffic @bam_margera for a "few more months". #freebam~~

~~124. This statement is defamatory insofar as it characterizes Jevremović as a trafficker and a con. Given Courville's repeated statements regarding Jevremović's guardianship, viewers would clearly understand "team con" to refer to Jevremović.~~

~~125. On July 1, 2022, Courville published a video to YouTube entitled "Virtual Reality Hell: The Amanda Rabb Story."⁸⁵ At 31:02 she states:~~

~~I operate in one absolute thing and that is truth. Lima didn't tell the truth.~~

⁸⁴ <https://www.instagram.com/p/Cef9opHlvNm/> (Accessed October 14, 2024.)

⁸⁵ https://www.youtube.com/watch?v=xdFvYfuEUuA&list=PLO9hzkqACQ1yoJ_RPLakmoyil7pb84_Uq&index=2

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~~126. By these statements, Courville impugns Jevremović's honesty, and emphasizes that Courville's statements are accurate and factual.~~

~~127. In this same video, at 31:31, Courville states:~~

~~That was not true. Amanda was hand chosen because they had the cooperation of Larry Rabb.~~

~~128. These statements are defamatory insofar as they impugn Jevremović's honesty.~~

~~129. On September 10, 2022, Courville published a video to YouTube entitled "Lima Jevremovic Made A Video About Me,"⁸⁶ in which she states at 17:53:~~

~~I joke about stuff, and I make light of situations, but like, make no mistake, this isn't drama, this is very serious.~~

~~130. By this statement, Courville emphasizes that her statements are not jokes or hyperbole but should be understood as accurate and factual by her viewers.~~

~~131. Courville reiterates this in the same video at 18:15, when she states:~~

~~It's very serious, a woman is dead, a woman has passed under [Jevremović's] care.~~

~~132. This statement both defames Jevremović by characterizing her as personally responsible for wrongdoing, i.e., a woman's death, and reiterates that Courville's statements are serious and should be taken as such.~~

~~133-64. On July 30, 2023, Ms. Courville published to YouTube a video titled "Missing Twin NEEDS Help | *URGENT*."⁸⁷ At 1:37 into the video, she states~~stated~~:~~

Another story is the Amanda Rabb story and the fact that Lima did take over Amanda's life and healthcare in order to give her an experimental treatment and Amanda Rabb, as you know, did not survive the treatment. She passed away in the treatment center, in the AURA treatment center,

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67. ⁸⁶ https://www.youtube.com/watch?v=RtwiHx8_oMA

⁸⁷ https://www.youtube.com/watch?v=7d_8hiUYONQ (Accessed September 8, 2023October 21, 2024.)

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and then Lima lied about how Amanda died and she never really gave a good explanation for that.

~~134. These false statements are defamatory insofar as they impugn Jevremović's honesty.~~

~~135-65.~~ Later in ~~this~~the same video, at 10:55 she ~~states~~stated;

This has turned into a me versus everyone, everybody in the family, all the – no, it's the truth versus lies.

~~136-66.~~ Ms. Courville thus ~~emphasizes that~~emphasized her statements ~~areas~~ accurate and factual.

~~137-67.~~ Ms. Courville also ~~states~~stated in ~~this~~the video, at 11:12:

Not only do we have one unexplained death that has happened in Lima's care, we also now have allegations of sex trafficking of people that Lima has purported to be in care of, and Bam Margera told me himself he was held against his will for months without access to a phone, computer, internet, any of it.

~~138. These statements are defamatory insofar as they characterize Jevremović as a criminal, which she is not.~~

~~139. Courville then goes on to claim, "it's about the truth for me," before reading a letter which she states she sent to 25 to 50 different outlets and encourages viewers to also send, which states:~~

~~I am a lawyer and independent journalist with a few YouTube channels.~~⁸⁸

~~140. Courville thus further relies on her legal background to support that her statements are accurate and factual; they are not.~~

~~141. Courville's letter, as read aloud in this video and posted in the video's description via a Google Doc for her followers to send, also states:~~

68. ⁸⁸ https://www.youtube.com/watch?v=7d_8hiUYONQ (Accessed September 8, 2023.)

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~~[Bam Margera] told me that he was held in rehab against his will and denied medical treatment.⁸⁹~~

~~142. This statement is defamatory insofar as Courville identifies Jevremović as responsible for Margera's treatment and characterizes such treatment as criminal.~~

~~143. On August 14, 2023, April 27, 2022, Ms. Courville published a video to YouTube entitled "SHOCKING* Presentation by Lima from AURA (NEW)"⁹⁰ in which she references her legal background, stating at 20:50:~~

~~I think I scored in the 96th or 97th percentile on [the LSAT], like I scored in the top like three or four percent of everyone who took the test.~~

~~144. This statement serves to legitimize Courville's statements as factual and accurate, which they are not.~~

~~145. In this same video, Courville repeats the same false, defamatory statements detailed herein about Jevremović with regard to Ms. Rapp's death.~~

~~146. In an August 2022 video, Defendant Benipal appeared alongside Courville on the "That Surprise Witness" YouTube channel and personally made false or misleading statements regarding Jevremović and regarding Ms. Rapp's death, such as Benipal's statement at the 10:07 mark: "Had [Jevremović] left Amanda alone, Amanda might be alive today..."⁹¹~~

~~147. This statement is defamatory insofar as Courville identifies Jevremović as responsible for Ms. Rabb's death, which has no basis in truth.~~

~~148. Jevremović's reputation and business endeavors has been negatively impacted, if not destroyed by Defendants' actions, and she has unduly suffered humiliation, emotional distress, anger, embarrassment, sadness, frustration, fear, loss of income, chagrin, severe~~

69. ⁸⁹https://www.youtube.com/watch?v=7d_8hiUYONQ (Accessed September 8, 2023.)

70. ⁹⁰<https://www.youtube.com/watch?v=Emm1WfIdZbE> (Accessed September 5, 2023.)

71. ⁹¹<https://www.youtube.com/watch?v=5EPVSf8Kdlo> at 10:07 (Accessed September 5, 2023.)

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~~anxiety, stress, shame, mortification, hurt feelings, sleeplessness, and physical manifestations thereof resulting from Defendants' above-described actions. Jevremović's associated damages are in an amount to be proven at trial, but in no event less than the jurisdictional minimum of this Court.~~

~~149. Defendants knew or should have known each of these statements to be false at the time the statement was made, and thus, Defendants acted with actual malice sufficient to support an award of punitive damages.~~

~~150. Defendants intentionally and maliciously made the above-quoted false statements over several months in an attempt to benefit themselves by gaining more online attention and compensation for more views on their social media publications. Defendants made these false statements in a wanton and willful disregard of Jevremović's rights. Defendants knew or should have known at the time that they made the statements that serious harm would arise from Defendants' conduct, and Defendants, with knowledge of the harm caused, continued such conduct. Defendants' outrageous, egregious, and exceptionally wrongful behavior should be punished in the form of punitive damages to deter them from similar wrongful conduct in the future.~~

~~SECOND COUNT~~

~~— LIBEL —~~

~~(By Plaintiff AURA against All Defendants)~~

~~151. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 150 as though fully set forth in this paragraph.~~

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~~152-68.~~ On April 27, 2022, Courville published ~~toon~~ Instagram an image⁹² showing a digital message sent to her in which the message-sender ~~criticizes~~ criticized Ms. Courville for spreading falsehoods. An anonymous commenter asked,

When has Lima Jevremović [sic] . . . ever up held [sic] HIPPA [sic]?

69. Ms. Courville responded;

never not once [sic].

~~153.~~ This statement is defamatory insofar as it references Jevremović's work on behalf of AURA, and it asserts that Jevremović, and by extension, AURA, violate the Health Insurance Portability and Accountability Act ("HIPAA"). Because AURA's products are used in mental health treatment, they must (and do) comply with HIPAA. Courville's statements are defamatory *per se* insofar as they falsely allege that AURA is irresponsible with its clients' private information and that AURA does not follow black letter law. Such statements would damage AURA's esteem and reputation amongst patients, healthcare practitioners, investors, and others, and would lead third parties to think that AURA is incompetent in its business or engages in misconduct in its business operations.

~~154-70.~~ On April 27, 2022, Ms. Courville republished an image⁹³ containing another's statements ~~toon~~ Instagram regarding Ms. Rabb, Mr. Margera, and Ms. Jevremović; an anonymous commenter asked;

Are [Ms. Jevremović and AURA,] using homeless people with addictions to experiment on them for their [YouTube] channel?

⁹² <https://www.instagram.com/p/Ce22uuMsobQ/> <https://www.instagram.com/p/Ce22uuMsobQ/> (Accessed October 21, 2024.)

⁹³ <https://www.instagram.com/p/Ce3REs7FNGJ/> <https://www.instagram.com/p/Ce3REs7FNGJ/> (Accessed October 21, 2024.)

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and Ms. Courville unequivocally affirmed the commenter's statement;

yes.

~~155-71.~~ By affirming the commenter's statement, Ms. Courville effectively adopted the statement as her own. ~~This false statement is defamatory as it explicitly states that Jevremović and AURA are experimenting on homeless individuals, implying that they are doing something inhumane. It further implies that Jevremović and AURA are dishonest insofar as Courville's statement contradicts Jevremović's stated reason for providing care to Rabb.~~

~~156-72.~~ On March 31, 2022, Ms. Courville published ~~to on~~ Instagram an excerpt⁹⁴ from a video in which Ms. Jevremović read Rabb's cause of death as a seizure disorder. Ms. Courville ~~pauses~~paused and ~~adds~~added commentary, including, at 0:10: Jevremović states in the video;

Rabb never had seizures prior to being homeless.

Ms. Courville ~~comments~~further commented and ~~states~~stated;

But I think another way of saying that is she never had seizures prior to using AURA.

~~157-73.~~ Ms. Courville thus ~~seeks to~~falsely ~~imply~~stated that AURA's products caused Ms. Rabb's seizures ~~and potentially caused her death.~~

~~158-74.~~ On March 31, 2022, Ms. Courville published on Instagram a photo⁹⁵ of Ms. Rabb wearing virtual reality headgear and participating in a "Virtual Reality Exposure

⁹⁴ <https://www.instagram.com/p/CbxaISSgRxR/> <https://www.instagram.com/p/CbxaISSgRxR/> (Accessed October 21, 2024.)

⁹⁵ <https://www.instagram.com/p/CbxIzVsOT-D/>

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Therapy Session using AURA.” A person commented on the photo with interest in the virtual reality-based treatment, and Ms. Courville responded;

the issue is that Rabb was forced to do this treatment under threat of going to prison. She was set up against her will with the help of the government do be used as a test subject and marketing tool.

I agree with you completely that it ‘seems cool’. What’s not cool is taking away someone’s choice for their own treatment.

~~159. This statement is defamatory insofar as it falsely states that patients have the AURA system forced upon them as a test subject; such a statement carries negative implications about AURA as people are generally opposed to being forced to test healthcare treatments.~~

~~160-75.~~ On April 1, 2022, Ms. Courville published an excerpt⁹⁶ from a program for a virtual reality conference which included Ms. Jevremović and her then-company, which worked with virtual reality in jail and prison settings. Ms. Courville commented on the image;

Seems like Lima has BEEN looking for a way to use experimental virtual reality apps on vulnerable populations that she views as ‘problematic’. #InvestigateAURA #FreeBam #~~RabbRabb~~ AmandaRabb.

~~161. This statement is defamatory insofar as it characterizes Jevremović and AURA as experimenting on vulnerable populations whom Jevremović purportedly views as “problematic” and insofar as it contradicts Jevremović’s stated reasons for working with those suffering from mental health disorders (thereby impugning her honesty); such a characterization is highly offensive and falsely imputes a motive to Jevremović and to AURA which most people would find condemnable.~~

<https://www.instagram.com/p/CbxIzVsOT-D/> (Accessed October 21, 2024.)

⁹⁶ <https://www.instagram.com/p/Cb02KZuAJEe/> <https://www.instagram.com/p/Cb02KZuAJEe/> (Accessed October 21, 2024.)

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76. At least one commenter, danielle trotter, believed Ms. Courville's comments, and responded:

This is so sick 🤢. She's torturing people that are often ignored by society and disgusting it as "help". It's giving me old time my "insane asylum" vibes. Thank you for researching and casting light on this BJ. This is so heavy.

~~162~~77. On March 30, 2022, Ms. Courville published another excerpt from a video⁹⁷ in which Ms. Jevremović ~~describes~~described the use of AURA products in connection with Ms. Rabb's treatment. Ms. Jevremović ~~explain~~explained that AURA provides its products at no cost and uses the data collected for research purposes, and Ms. Rabb would have the opportunity to serve as a case study. Ms. Courville commented on the video:

Rabb did not consent to being used as a research object. She was court ordered into a conservatorship after Lima, mark Laita, and Rabb's dad SET HER UP. This same woman petitioned to put Bam into a conservatorship. #FreeBam #~~Rabb~~RabbAmandaRabb #InvestigateAURA

~~163. These statements are defamatory as they falsely state that Jevremović and AURA forced Rabb to test AURA products — people are generally opposed to being forced to test healthcare tools. Such a statement negatively impacts AURA's reputation.~~

78. Defendants' audience believed Ms. Courville's false accusations and commented, for example:

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⁹⁷ <https://www.instagram.com/p/CbvGodsJLtE/> (Accessed October 21, 2024.)

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ms.sarah.esq 132w

She sounds like another Elizabeth Holmes of Theranos touting fake technology, killing people with it, and getting away with murder because somehow she figured this shit out. What the absolute fuck.

1 like Reply ...



freelizzieharding 132w

PSYCHOPATHS. Sociopaths. The abuse of mental health and hygiene laws to enslave humanity. #WAKEUPEVERYONE. #freelizzieharding



litigiousgrl 132w

Disgusting, extremely reckless and dangerous...

Reply



barbielluttman 132w

This is so evil.

6 likes Reply



gogogadgetadvocatechick 132w

These pig tails are soooooo manipulative

12 likes Reply ...

164.79. On February 22, 2022, Ms. Courville published to YouTube a video⁹⁸

in which she ~~defames~~defamed Ms. Jevremović and AURA. At 49:55, in the video, Ms. Courville falsely ~~states~~stated;

⁹⁸ <https://www.youtube.com/watch?v=hAPdBs398ve> (Accessed September 5, 2023.)

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[Jevremović] forces people by court order to use [AURA's] tools.

80. ~~This statement is defamatory insofar as it falsely states that~~ In fact, Ms. Jevremović and AURA did not have any control of the treatment Ms. Rabb received at the treatment centers, which Ms. Jevremović ~~on behalf of AURA imposes conservatorships on people as a means to force people to use AURA's tools (from which AURA and Jevremović would purportedly profit); people will generally understand this or~~ AURA did not own or control. Ms. Courville knew her statement to be false and/or acted with reckless disregard for the truth or falsity of the statements.

81. While Ms. Courville claimed to publish nothing but the truth, she chose not to show to her audience that Ms. Rabb admitted during her April 19, 2022 interview with Mr. Laita that she had been clean of substance abuse for 10 to 11 months at that time, that the treatment she was receiving "really helped," and what Ms. Rabb thought of Ms. Jevremović:

Ms. Rabb: I'm so glad you hooked us up with Lima. She feels like a mom. You know I never had my mom so it feels like such a blessing just to have her in my life, and just have you guys for support, because I really only have my dad so.

Mr. Laita: You couldn't pick somebody better than Lima.

Ms. Rabb: Yeah she's great. Lima's great.

82. Ms. Rabb further confirmed that "I'm blessed to have you and Lima. You guys are the best, like honestly."

<https://www.youtube.com/watch?v=hAPdBs398vc> (Accessed on September 5, 2023.) When accessed on October 14, 2024, the video is no longer available. It is hereby submitted that Defendants admitted that this video should not have been published because Ms. Courville removed the video at a later date.

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83. Defendants' so-called truths are directly contradicted by statements, including those from Ms. Rabb herself, that pre-dated any of the defamatory statements that Defendants made.

II. MS. COURVILLE SPREADS FALSE STATEMENTS REGARDING JEVREMOVIĆ'S INVOLVEMENT WITH MR. MARGERA

84. Celebrity entertainer Mr. Margera and his wife, Nicole Boyd-Margera ("Ms. Boyd-Margera"), took an interest in AURA in the Winter 2020. Mr. Margera has starred in the blockbuster Jackass movies and popular television programs. Mr. Margera fought a longtime battle with substance abuse and witnessed numerous members of his inner-circle fight addiction over the previous two decades. Because of his background, Mr. Margera and Ms. Boyd-Margera initially sought to provide their support to Plaintiffs' efforts to rehabilitate addiction and improve related health outcomes. When Mr. Margera proved susceptible to multiple relapses in his battle with addiction, Mr. Margera's family approached Ms. Jevremović for intervention assistance.

85. When Mr. Margera's family and friends implored Ms. Jevremović to serve as Mr. Margera's temporary guardian, Ms. Jevremović agreed and took on the responsibility for overseeing Mr. Margera's treatment, which was put into effect by Court Order, with no connection to his financials or other aspects of his life. On or about June 7, 2021, an Arizona court imposed a one-year temporary guardianship over Mr. Margera in connection with his diagnosed medical issues. Indeed, despite the fact that the Ms. Jevremović was statutorily permitted to collect reasonable sums for her services as guardian, Ms. Jevremović was not reimbursed for funds she advanced for Mr. Margera's treatment and legal fees. Mr. Margera's father had been assisting Mr. Margera in managing his finances for many years at Mr.

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Margera's request, and Ms. Jevremović's appointment as a temporary guardianship did not touch upon Mr. Margera's money in any way.

86. After the court-ordered guardianship terminated, Mr. Margera requested that Ms. Jevremović continue to serve as his "Health Care Agent," a role in which she assisted Mr. Margera with his medical care related to his mental health treatment and recovery.

87. After learning that Ms. Jevremović was involved in Mr. Margera's recovery, Ms. Courville began publishing videos, photos, and text commentary regarding Mr. Margera, labeling her publications "#FreeBam," a reference to Mr. Margera's stage name, "Bam."

88. Ms. Courville began with baseless assertions that Mr. Margera's family and Ms. Jevremović manipulated a court-imposed guardianship as a tool to access Mr. Margera's assets, that Ms. Jevremović is committing and assisting in the commission of criminal acts, and that Ms. Jevremović is dishonest and promulgates lies.

89. Ms. Courville continued to publish videos, photos, and textual commentary in which she falsely accused Ms. Jevremović of criminal acts and dishonesty.

A. defamatory insofar as foregoing Ms. Courville Published False Statements that Ms. Jevremović Was a Conservator and Was Able to Access Mr. Margera's Assets, With Knowledge of Their Falsity or a Reckless Disregard for the Truth or Falsity of Those Statements

90. Defendants knew, or had a reckless disregard for the truth, that Mr. Margera was under guardianship, and not a conservatorship. Ms. Courville, who often touts her legal credentials, knew or should have known the difference between a guardianship and a conservatorship.

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91. On or about February 9, 2022, Defendants published the following post on Instagram:⁹⁹

Novak said Margera is currently 'in a programme', while Steve-O went on to explain that he is also under a 'guardianship'.

"It's not a conservatorship, it's a guardianship," he said.

"The conservatorship has financial implications, with a conservatorship they're in charge of all of your money and everything. With a guardianship, they kind of leave your money out of it, and the guardianship they're just like – there's rules you have to abide by and he's forced to be in."

92. Notwithstanding that the statements published by Defendants expressly stated, among other things, that Mr. Margera was under a guardianship, and that conservatorship has financial implications, while guardianship has not, Defendants commented, among other things:

Bam margera from jackass is in a conservatorship.

His so called friends are erroneously stating that guardianships and conservatorships are not the same thing. The so called friends are mistaken.

93. As correctly stated in the original post, above, in Arizona, a conservator's "first priority is to marshal and protect the assets of the conservatorship estate,"¹⁰⁰ while a guardian's responsibility is to "ensure that the ward is receiving appropriate medical care.

⁹⁹ <https://www.instagram.com/p/CZwfgSFxJo/> (Accessed October 10, 2024.)

¹⁰⁰ <https://supremestateaz.granicus.com/player/clip/2663?redirect=true> (Accessed October 14, 2024.)

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proper education and their overall health and welfare is protected.”¹⁰¹ Such distinction is easily accessible on the website of Arizona Judicial Branch.¹⁰²

94. Indeed, the training modules provided by Arizona Judicial Branch specifically provide, in relevant part: ¹⁰³

The law allows a guardian to handle money on behalf of the ward if there is no conservator appointed. In most instances, if the ward receives more than just Social Security income and has significant assets, such as a home, car or brokerage account, then the court will appoint a conservator. *The Order to Guardian indicates that the guardian shall not manage more than \$10,000 on behalf of the ward.*

(emphasis added).

95. While being informed about the difference between guardianship and conservatorship, Defendants misrepresented the concepts with reckless disregard for the truth of their statements.

96. On April 19, 2022, Ms. Courville published an image ¹⁰⁴ on Instagram containing a short conversation between Ms. Courville and a commenter. The commenter accurately stated:

[Mr. Margera is] not under a conservatorship[:]; he’s under a guardianship – big difference.

97. As recounted in the discussion of Mr. Margera above, he was subject to guardianship imposed in Arizona, and at no relevant time was a conservatorship been imposed. Nonetheless, Ms. Courville invoked her credentials, suggesting she holds expertise.

¹⁰¹ <https://supremestateaz.granicus.com/player/clip/2662?redirect=true> (Accessed October 14, 2024.)

¹⁰² <https://www.azcourts.gov/educationservices/COJET-Classroom/Probate-Guardianship> (Accessed October 16, 2024.)

¹⁰³ <https://supremestateaz.granicus.com/player/clip/2662?redirect=true> (Accessed October 14, 2024.)

¹⁰⁴ <https://www.instagram.com/p/CcibN0JOx89/> (Accessed October 14, 2024.)

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and again provided an inaccurate interpretation of the law, and solicited viewers for her advertisement-supported videos:

are you a lawyer? Because I am. It's not different. It's exactly the same. Different states just call it different things. Please feel free to check out my Bam Mr. Margera playlist on YouTube for more info!

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In response, a commenter remarked:

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Every state is so different that I think these people use it to confuse people. I wonder if it would help if it was more uniform across the United States?

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Ms. Courville, apparently drawing upon her self-avowed expertise, explained: "it's to confuse people so the criminals can keep crim[e]-ling."

98. When Defendants' audience questioned the parameter of Ms. Jevremović's duties as a guardian to Ms. Courville, who touted her background as a lawyer, Ms. Courville again made false statements regarding Ms. Jevremović's role in the treatment of Mr. Margera, with reckless disregard for the truth of her statements, knowing that her audience viewed her as an authority to answer questions involving legal terms.

99. For example, a user "courtcarls" commented:

Especially when it's a lawyer who went to UPenn and knows their shit to the point that powerful people have tried to silence them! Sounds like a damned good lawyer to me 🤔

100. On or about June 24, 2022, Defendants published the "Order Appointing Emergency Temporary Guardian With Inpatient Mental Health Authority," entered by the Superior Court of the State of Arizona, County of Maricopa. The Order, published by Defendants, included Ms. Jevremović's Application to be appointed as a temporary guardian – the Application is not accessible to the public.¹⁰⁵ Notwithstanding that the Court Order

¹⁰⁵ https://www.instagram.com/p/CfMCi1dOg51/?img_index=1 (Accessed October 10, 2023.)

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specified that Bam was under guardianship, Ms. Courville posted under the Court Order, among other things:

EXCLUSIVE @bam_margera CONSERVATORSHIP COURT DOCUMENTS going live TODAY

101. Defendants published the statement with reckless disregard for the truth or falsity of it, to lay foundation for their preconceived story that Mr. Margera's family and Ms. Jevremović manipulated a court-imposed guardianship as a tool to access Mr. Margera's assets, even though Ms. Jevremović was not authorized to do so – a fact Defendants knew or acted in reckless disregard of the truth or falsity of such statement.

102. From June 22, 2022 to June 24, 2022, Ms. Courville published, no less than five (5) posts, on her Instagram, documents filed in the Superior Court of the State of Arizona, County of Maricopa, in the matter captioned "In the Matter of the Guardianship of: BRANDON MARGERA."'¹⁰⁶

103. The Guardianship and Conservatorships webpage of the Maricopa Court Website provides, as the first sentence on this webpage: ¹⁰⁷

A guardian is someone who has the legal authority to care for another, and a conservator is someone who manages another's financial affairs.

¹⁰⁶ See https://www.instagram.com/p/CfH7x3rl_T0/?img_index=1 (Accessed October 16, 2024.); https://www.instagram.com/p/CfH9HOulAJw/?img_index=1 (Accessed October 16, 2024.); https://www.instagram.com/p/CfH9ZSMlbye/?img_index=1 (Accessed October 16, 2024.); <https://www.instagram.com/p/CfIEZqjDQ4/> (Accessed October 16, 2024.); and https://www.instagram.com/p/CfMC1dOg51/?img_index=1 (Accessed October 16, 2024.).

¹⁰⁷ <https://superiorcourt.maricopa.gov/departments/superior-court/probate/guardians-and-conservatorships/> (Accessed October 14, 2024.)

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104. Ms. Courville publishes, until today, that Ms. Jevremović petitioned conservatorship for Mr. Margera, and as such, managed Mr. Margera's financial affairs, with knowledge of its falsity or a reckless disregard for the truth or falsity of those statements.

105. On March 30, 2022, Ms. Courville published to Instagram a screenshot¹⁰⁸ of comments made to Instagram, in which she stated, among other things, "[Lima] filed a petition to put him in a conservatorship in Florida..."

106. A commenter asked:¹⁰⁹

Aleggedy [sic] right?

Ms. Courville responded:

no. This is documented on court records.

107. By responding to their audience's comment, Defendants reinforced the false and defamatory statements Defendants previously made.

108. A commenter asked:¹¹⁰

forced incarceration, experimenting on homeless & celebrity cash cows to fund her treatment centers? If im [sic] wrong on anything[,] please [let me know.]

Ms. Courville responded:

I mean... that's my impression, so if you're wrong[,] I am too.

109. Ms. Courville thereby explicitly adopted the commenter's false statements.

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¹⁰⁸ <https://www.instagram.com/p/CbvFUFAOuoU/> (Accessed October 14, 2024.)

¹⁰⁹ <https://www.instagram.com/p/CbvFUFAOuoU/> (Accessed October 14, 2024.)

¹¹⁰ <https://www.instagram.com/p/CbvFUFAOuoU/> (Accessed October 14, 2024.)

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110. Ms. Jevremović does not engage in experiments on the homeless and has no treatment centers; further, the pejorative term “celebrity cash cows” implies that Ms. Jevremović is exploiting celebrities for money.

111. On April 3, 2022, Ms. Courville published an image¹¹¹ on Instagram, which purports to list biographical information about Mr. Margera, including his putative net worth (\$20 Million). Ms. Courville commented on the image:

According to @distractify, [Margera] is worth \$20 million. Now who would have an incentive to want to control that money and who would be in a position to do so 🤔🤔🤔 but what do I know I’m just a cOnSpIrAcY tHeOrIsT 🤔🤔🤔🤔 #FreeBam.

A commenter stated:

20 million now, soon to be much less, but it’ll all be ‘legit.’

to which Ms. Courville responded:

but a certain someone will have fresh lips, Botox, and a BBL watch.

To which the same commentator responded:

plus a vehicle, home, medical expenses, all necessary in order to fulfil duties.

112. Based on her other comments using the term “#FreeBam,” her audience would reasonably interpret Ms. Courville’s comments here to reference Ms. Jevremović– in fact, people for the purpose of generating did comment in response who understood the messages to reference Ms. Jevremović.

113. Under the post, Ms. Courville also admitted to her viewer that she only called it “conspiracy theory” to avoid legal responsibility, as follows:

¹¹¹ <https://www.instagram.com/p/Cb5b59wFxIg/> (Accessed October 16, 2024.)

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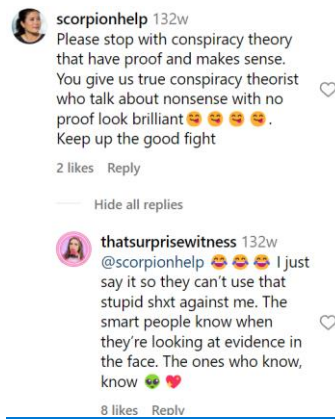
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114. On May 4, 2022, Ms. Courville published an image¹¹² on Instagram regarding Mr. Margera, to which she commented, in relevant part:

To clarify, I am a licensed attorney who believes @bam_margera's constitutional rights have been violated. Based on my education, knowledge, and experience, he has been set up by *a group of criminal co-conspirators for financial purposes* not in bams best interest.

(emphasis added).

115. The statement was made is in furtherance of Ms. Courville's defamatory statement that Ms. Jevremović was serving as a conservator, instead of a guardian, of Mr. Margera, and that Ms. Jevremović was able to touch upon Mr. Margera's finances.

116. The statement was published to Defendants' audience, who believe in Ms. Courville's credential as a licensed attorney who allegedly had conducted a thorough investigation of Mr. Margera's "conservatorship" and her assertion that Ms. Jevremović was in total control of Mr. Margera, including his finances. A user "chili been" commented, among other things:

¹¹² <https://www.instagram.com/p/CdJDkylMVl/> / (Accessed October 14, 2024.)

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...You have since presented Extremely damning evidence that Bam is being taken advantage of by people who want control of his money...

To which another user “simplymonca” responded:

We feel those on team-con have been working hard to discredit BJ so they can keep their profits, whether they be monetary or credit for their own business ventures, or control so that they can do with him as they please.

117. A user, “rhinestone _artist0” praised Ms. Courville’s videos as “investigates [] so well done btw, amazing investigative journalism, with all the receipts,” and commented, among other things:

If I was in Bam’s situation I would want a lawyer like you that was going to fight for me. I guess this person is completely OK with Lima being in charge of his decisions.

118. A user, “pettyhearth,” commented thereupon stating:¹¹³



pettyhearth 127w

I’ve been a Bam fan for 20 years, and his parents are good people who want the best for their son. While I personally believe conservatorships are never the answer and forced treatment is harmful, if it was just them in charge I would at least have peace of mind that there is no malicious intent. But they aren’t in charge, Lima is, and she’s a snake oil salesman with blood on her hands. She’s clearly adept at manipulation, and I have no doubt she is manipulating Phil and April.

47 likes Reply ...

119. Ms. Courville published a reply directly to this statement expressing agreement: “bingo.”

¹¹³ <https://www.instagram.com/p/CdJDkylMVl/> / (Accessed October 14, 2024.)

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B. Defendants Continued to Publish Defamatory Statements Based on the False Foundation that Ms. Jevremović Can Access Mr. Margera's Assets

120. On May 30, 2022, Ms. Courville published via Instagram the statement¹¹⁴:

Lima [Jevremović]. . . LIED ABOUT [AMANDA'S] CAUSE OF DEATH TO MILLIONS of people.

121. In the same statement, published alongside photos and videos of Ms.

Jevremović at Disneyland with Mr. Margera and his family, Ms. Courville referred to Ms. Jevremović as a "handler[]" and trafficker[]."

122. Defendants' viewers and audience demonstrated that they believed Ms. Courville's statements that Ms. Jevremović is a trafficker or criminal by commenting, among other things:



ryanbohac 123w
#investigateLima
#investigateloumtaylor
#investigateaura #freebam

3 likes Reply

123. On April 25, 2022, Ms. Courville published on Instagram an excerpt¹¹⁵ from a Complaint previously filed by Mr. Margera against others affiliated with his television and film career. A commenter stated in response:

You discover so much more each days [sic] that goes by.. I don't trust any of them.. If this man does not come out of this [conservatorship.] they will eventually [k]ill him with prescription drug[s] or disguise street drugs as prescription drugs[;] who knows.. If [Britney Spears] would not be out of this[,] she would probabably be de[a]d by now.. This man need[s] to be saved and free now.. #freebam.

¹¹⁴ https://www.instagram.com/p/CeMD_1AUo7L/?img_index=1 (Accessed August 28, 2023.)
October 14, 2024.)

¹¹⁵ <https://www.instagram.com/p/CcxsX9HsR9H/> (Accessed October 16, 2024.)

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In response, Ms. Courville stated: “the plan is to end his life. I’m convinced of it. #savebam.”

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124. On April 19, 2022, Ms. Courville published on Instagram a screenshot¹¹⁶ of a conversation between unidentified persons regarding Mr. Margera. Ms. Courville commented, describing “[L]ima [J]evremović” as an “alleged trafficker.”

125. One of Defendants’ viewers praised Ms. Courville’s post as “speaking truth, doing God’s work.”

126. On April 18, 2022, Ms. Courville published a screenshot¹¹⁷ of a highlighted excerpt from an article discussing the application of Iceland law and whether Mr. Margera’s and his wife’s marriage is legally recognized. A commenter on the image asked:

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where are his parents?

127. to which Ms. Courville responded, referring to Ms. Jevremović:

helping the criminals [sic] girl.

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128. On April 3, 2022, Ms. Courville posted a screenshot¹¹⁸ of an excerpt of a celebrity tabloid article on Instagram, in which she highlighted a portion of the title stating, “Margera Used To Have A \$45 Million Net Worth”; Courville commented on the photo, saying:

I heard forced rehab is expensive... I learned that from Lima from @meetAURA. Who now has @bam margera in a forced rehab. WhT are the chances!! That’s just my conspiracy theory lol 🤪 #FreeBam.

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129. By linking the cost of rehabilitation, as described by Ms. Jevremović, to the supposed depletion of Mr. Margera’s net worth, Ms. Courville falsely characterized Ms.

¹¹⁶ <https://www.instagram.com/p/CciJ3HsuFIX/> (Accessed October 14, 2024.)

¹¹⁷ <https://www.instagram.com/p/Cef9UdxuHYc/> (Accessed October 14, 2024.)

¹¹⁸ <https://www.instagram.com/p/Cb5djK4FXNI/> (Accessed October 14, 2024.)

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Jevremović as depleting Mr. Margera's money, rather than assisting with treatment for a substance abuse disorder.

130. The statement is also a continuation of Ms. Courville's previous defamatory statements that Ms. Jevremović was Mr. Margera's conservator, a role permitted by law to manage Mr. Margera's finances, notwithstanding that Ms. Jevremović was a guardian.

131. Defendants' audience believed Ms. Courville's implication that Ms. Jevremović financially benefited from Mr. Margera's guardianship. A viewer, officialbogwitch, commented, in relevant part: "It's not unreasonable to think that Lima would also wanna sink her claws into his parents and manipulate them out of what little he has left."

132. On April 4, 2022, Ms. Courville published to YouTube a video entitled "What Happened to Bam Margera? EXCLUSIVE POLICE REPORT"¹¹⁹ in which she defamed Ms. Jevremović. In the video, Ms. Courville claimed that Ms. Jevremović conspired with Steven Timmer and Mr. Margera's aunt, Antoinette Melissa Dompierre, a/k/a, Aunt Missy, to deceive Mr. Margera into flying to Florida, and then to have police arrive at the hotel that he was staying so that he could be escorted to a treatment center in Florida.

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133. Ms. Courville made numerous false statements in that video, including, but not limited to, that Ms. Jevremović was present at the hotel when the police were called to the hotel to "setup" Mr. Margera's arrest.

134. In that video, Ms. Courville read to her audience an online article, titled "Bam Margera allegedly attacked woman while on cocaine, 911 call shows" published on Page Six, on October 13, 2021.¹²⁰ The article provided, among other things, that 911 was called because

¹¹⁹ <https://www.youtube.com/watch?v=b3beCLgl6aw> (Accessed September 8, 2023October 14, 2024.)

¹²⁰ <https://pagesix.com/2021/10/13/bam-margera-attacked-woman-while-on-cocaine-911-call-shows/> (Accessed October 14, 2024.)

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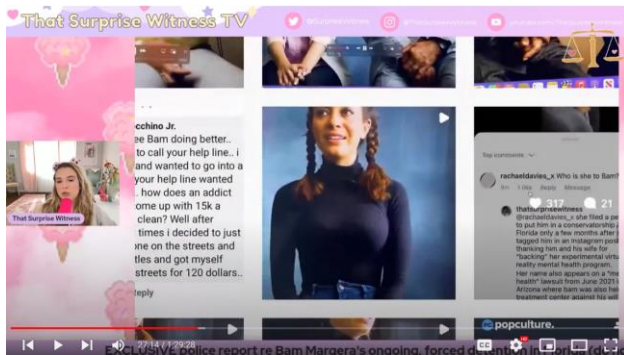
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Mr. Margera allegedly assaulted a female, stating that “[Mr. Margera] attacked her, grabbed her breast, and she said she thinks he tore her implant.” The article further provided that the 911 caller claimed that Mr. Margera was in the room with a prostitute and a “minder” when the alleged assault happened.

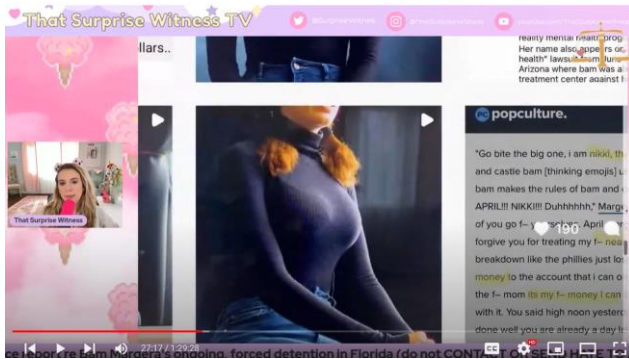
135. While reading the article to her audience, Ms. Courville stated:

Then he referenced the some alleged victim and says he attacked her, grabbed her body part and she thinks he tore her implant. Now I don't know who this alleged victim could be. I don't know who could possibly have implants. I don't know whose implant he could have been accidentally tearing, who maybe was trying to force him to go somewhere against their will. But it's all going to add up real soon...

136. While making the statements above, Ms. Courville clicked on two pictures of Ms. Jevremović, and zoomed in those two pictures, such as insinuating that Ms. Jevremović was the woman referred in the article:



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137. Of course, Ms. Jevremović was in the State of Washington when the alleged assault occurred.

138. Furthermore, the article that Ms. Courville was reading from provided, in relevant part:

The caller described the alleged victim – whose name will not be disclosed out of discretion – as a white woman in her 50s or early 60s.

And

Bam was with his aunt in the hotel room. She is a 65-year-old woman, who is clean and sober...

139. As such, it was plain from the article that Ms. Courville was reading from, that Ms. Jevremović, who was in her 30s, could not have been the alleged victim.

140. Ms. Courville, in making that statement, showed a reckless disregard of the truth or falsity of her statements.

141. Defendants' audience interpreted Ms. Courville's defamatory statements as the truth. A user, "ultimateluxe" commented under Ms. Courville's Instagram post of an excerpt

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in which Ms. Jevremović was wearing the same black sweater as in the two pictures that Ms.

Courville zoomed in:¹²¹



_ultimateluxe 132w

Looks like one of her implants was already ripped/leaking but she blamed it on bam, smh

Reply ...

142. Another user “myshittyreviews” commented under the same post:



myshittyreviews 133w

She must be the prostitute that got her implant torn. Cause none else was in that room besides Bam and his aunt. 🤔

8 likes Reply

— Hide all replies



thatsurprisewitness 133w

@myshittyreviews 🤔 🤔 🤔
the “minder”

4 likes Reply

143. Knowing that her statements were false, Ms. Courville did not correct any of the statements, but reinforced the false statements by replying to her audience to imply that Ms. Jevremović was at the scene and was actually the “minder” in the room, as described by the 911 caller.

144. At 27:39 of the video, Ms. Courville described Mr. Margera’s transfers between treatment facilities and states:

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¹²¹ <https://www.instagram.com/p/CbvGodsJLtE/> (Accessed October 16, 2024.)

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Honestly, some of it looks criminal. Now I'm a lawyer, but what do I know. It looks criminal to me.

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145. ~~is generally condemnable~~ This statement defames Ms. Jevremović insofar as Ms. Courville repeatedly identifies Ms. Jevremović as responsible for Mr. Margera's treatment, and insofar as Ms. Courville, invoking the authority she commands as a lawyer, describes aspects of Mr. Margera's treatment as criminal.

146. The audience targeted by the video believed Ms. Courville's statements, which aim to imply objective facts that are false – that Ms. Jevremović conducted criminal activity.

For example, a viewer commented:¹²²

145. Lima, when acting as guardian, unequivocally breached her fiduciary duty with the placement of Bam into a center that employs an interventionist with documented criminal behavior.

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147. A viewer of another of Ms. Courville's videos about Mr. Margera's "conservatorship," @JessicaC., commented:¹²³

Damn BJ why aren't you practicing law? You need to be a lawyer! You have your degree! You would make an amazing civil rights lawyer! By the look of it a lot of individuals who are dealing with addiction and being trafficked around to different facilities need legal representation! You would be perfect for this! You found your calling!

To which Ms. Courville, again, touted her legal background:

I am a lawyer. That's how I know this stuff 😊❤️

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And

I can make a LOT bigger difference doing stuff like this. I'm not meant to be an employee. Not my current path. But I do use my degree for civil rights! Just not the traditional way 🤔

¹²² <https://www.youtube.com/watch?v=b3beCLgl6aw> (Accessed October 14, 2024.)

¹²³ <https://www.youtube.com/watch?v=Cj6xVkd56tU&list=PLxoh8HZ0hbVHpC3RufJee77ZQkrxE0dRh&index=10> (Accessed October 16, 2024.)

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148. On July 8, 2022, Ms. Courville published to YouTube a video entitled “Bam's Family Breaks Silence on #FreeBam | Jess and April Margera SPEAK OUT.”¹²⁴ At 6:10, in the video she stated:

I do not say theories without being very explicit that it is my opinion or my belief or my suspicion. I never say anything as if it is a fact when I don't know it to be a fact.

149. Ms. Courville thus emphasized that her statements are accurate and factual even when they were not. At 15:59 of the video, Ms. Courville described herself as

the woman who dared use her, volunteer her time to help [Margera] out of a literal human trafficking situation [.]

150. Audience of the video praised Ms. Courville as “such a good investigator” and spoke highly of Ms. Courville: “Your passion for truth is so refreshing!!” It is clear that Defendants’ audience interpreted Ms. Courville’s statements as truth, not hyperbole.

151. A viewer of the video commented:

Lima reminds me of that lady from the movie “I care a lot” that movie is about a woman becoming rich off of putting people in conservatorships and stealing their money or making money off of them.

152. Defendants’ audience believed Defendants’ continuous false and defamatory statements about Ms. Jevremović.

153. On April 18, 2022, Ms. Courville posted a screenshot¹²⁵ of anonymous comments to Instagram, captioning the photo:

Looks like team con is planning to traffic @bam margera for a “few more months”. #freebam

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¹²⁴ <https://www.youtube.com/watch?v=Nr3e0RKY6Ig> (Accessed September 8, 2023October 14, 2024.)

¹²⁵ <https://www.instagram.com/p/Cef9opHlvNm/> (Accessed October 14, 2024.)

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154. On September 10, 2022, Ms. Courville published a video to YouTube entitled “Lima Jevremović Made A Video About Me,”¹²⁶ in which she stated at 17:53 of the video:

I joke about stuff, and I make light of situations, but like, make no mistake, this isn’t drama, this is very serious.

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155. By the statement, Ms. Courville emphasized that her statements are not jokes or hyperbole but should be understood as accurate and factual.

156. Defendants’ statements became so prolific that any Google search of Ms. Jevremović or AURA reveals the false accusations and defamatory statements posted by Defendants.

157. Defendants directly disrupted AURA’s second round funding, causing potential investors actively involved in funding discussions to retreat.

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158. Ms. Courville’s false and misleading statements about Plaintiffs have directly interfered with AURA’s business and caused damage to Ms. Jevremović, resulting in, among other things, order cancellations and the withdrawal of marketing affiliates.

III. DEFENDANTS’ INTENTIONAL RELEASE OF PRIVATE INFORMATION AND ENCOURAGEMENT OF UNLAWFUL CONDUCT

159. Ms. Courville has, at various times, published Ms. Jevremović’s social security number,¹²⁷ date of birth, unlisted home phone number, and three of Ms. Jevremović’s unlisted

¹²⁶ https://www.youtube.com/watch?v=RtwiHx8_oMA (Accessed October 10, 2024.)

¹²⁷ https://www.instagram.com/p/CfMC1dOg51/?img_index=2 (Accessed October 14, 2024). The Application for Appointment as Guardian posted by Defendants initially contained Ms. Jevremović’s Social Security Number, unredacted. When accessed on October 14, 2024, Ms. Jevremović’s SSN was redacted. As such, it is respectfully submitted that Defendants have admitted that posting Ms. Jevremović’s SSN is unlawful by redacting the SSN later.

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home addresses,¹²⁸ her family members' addresses, among many other information in a coordinated and intentional doxing campaign.

160. Additionally, Defendants' publication of Ms. Jevremović's sisters' addresses, resulted in putting Ms. Jevremović's sister, Dahlia, soon after the publication of her otherwise private address, in harms way.

161. After being besieged in their home in Washington State by Ms. Courville's devotees, where Ms. Courville encouraged followers to "make some noise" directed towards Ms. Jevremović, Ms. Jevremović and her family relocated to California for their safety and have hired a round-the-clock home security detail.

162. In or around August 2023, Defendants' "@thatsurprisewitness" handle on Instagram included a post with comments that included Ms. Jevremović's home address. Strangers began to appear near her front yard, lurking inexplicably, almost immediately upon the information being released on Defendants' "@thatsurprisewitness" Instagram handle. As a result, Ms. Jevremović had to relocate.

163. There was a video that urged Ms. Courville's followers to "make some noise," after arming her followers with Ms. Jevremović's mother's home address, phone number, and airing a humiliating mental health crisis video—a video that Oklahoma authorities have indicated should not have been available to the public.¹²⁹

¹²⁸ See, e.g., <https://www.instagram.com/p/Cvm7JP5ABLB/?hl=en> (Accessed September 6, 2023) When accessed on October 14, 2024, there is no longer publication of Ms. Jevremović's addresses under the post. It is hereby submitted that Defendants admitted that Ms. Jevremović's addresses should not have been published because Ms. Courville removed them at a later date. See also https://www.instagram.com/p/CfMCi1dOg51/?img_index=2 (Accessed October 10, 2024).

¹²⁹ <https://www.youtube.com/watch?v=CLiFEyC0WK8> (Accessed September 5, 2023). The Oklahoma police department from which this video footage was obtained has confirmed that this footage is not public information and Courville should not have been able to obtain it, and they have launched an on-going investigation into how Respondent was able to obtain these videos. When accessed on October 14, 2024, the video is no longer available. It

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164. As a result of Ms. Courville's doxing campaign, Ms. Jevremović's mother lost her job as a Software Engineer, after thousands of people used the information released by Ms. Courville to harass Ms. Jevremović's mother and make calls to her employer.

165. A collection of fans and Defendants' online supporters participated in private virtual meetings, and called themselves "That Surprise Army." At least one former dedicated member of That Surprise Army declared, under oath, that members of That Surprise Army had a discord server called That Surprise Army that had over 10,000 pieces of information about Ms. Jevremović and everyone she knew, including estimates and timelines of when Ms. Jevremović met certain people and where Ms. Jevremović was located.

166. According to that former member, the That Surprise Army believed that they were fighting for justice and gathered on the server to investigate Ms. Jevremović and her family on behalf of Defendants.

167. Ms. Courville communicated with her followers and encouraged them to "do their own research" while sharing private information with her followers about Ms. Jevremović and her family. Indeed, Defendants' numerous social media posts, videos, and directives, led Defendants' followers to believe that Ms. Jevremović was involved in criminal activities as Ms. Courville claimed.

168. Feeling compelled to assist Ms. Courville, no less than one member obtained Ms. Jevremović's mother's address, from a video published by Ms. Courville in which she also detailed Ms. Jevremović's sister's private medical information.

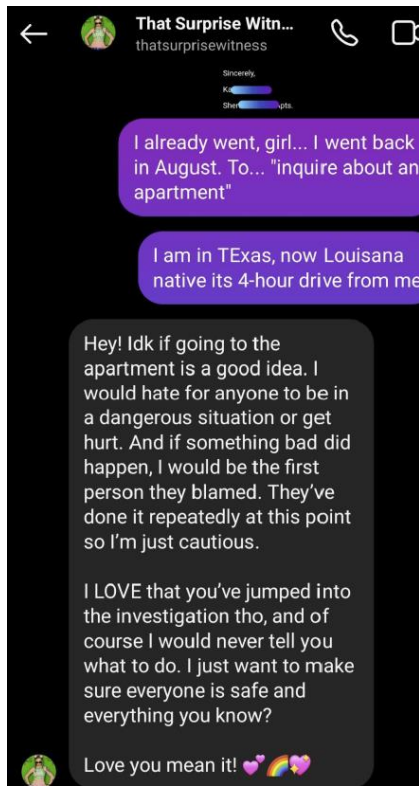
is submitted that Defendants have admitted that the video should not have been published because Ms. Courville has not removed it.

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169. In one of her videos containing the police intervention crisis footage, Ms. Courville persuaded thousands of her viewers that Ms. Jevremović's sister urgently required rescue from her own mother and from Ms. Jevremović.

170. In or around late 2023 or early 2024, that former member of That Surprise Army reached out to Ms. Courville privately via a direct message ("DM"), informing Ms. Courville that she had gone to the home of Ms. Jevremović's mother to look into the accusations and Ms. Courville responded by stating:



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171. Defendants' viewers believed they were doing the right thing because Ms. Courville claimed to be an attorney that knows the law and is advising her audience on what they are legally allowed to do to bring justice to "powerful criminals."

IV. ACTUAL MALICE

172. Ms. Courville made and published each of the many false statements with the knowledge that the statements were false when made, and/or with reckless disregard for the truth or falsity of the statements.

173. Ms. Courville touted her background as a lawyer, and advised her many viewers and listeners that her many false and defamatory statements should be believed because she has made the statements based on her "education, knowledge, and experience."¹³⁰ Ms. Courville has posted, among other things, her Attorney ID, and Bar Admission Date in the State of New Jersey.¹³¹ She has touted to her audience that she "graduated from Ivy League law school."¹³²

174. In addition to the many false and defamatory statements described above, in one especially intentionally humiliating post made on April 19, 2022, Defendants published a photograph¹³³ on the @ThatSurpriseWitness Instagram page, which appeared to be a screenshot of a female's account, whose name is "Lima Mora," as below:

¹³⁰ May 4, 2022 Instagram Post, at <https://www.instagram.com/p/CdJDkylMV1/> (Accessed October 10, 2024.) ("To clarify, I am a licensed attorney...")

¹³¹ <https://www.instagram.com/p/Cf4a8l0lr1N/> (Accessed October 10, 2024.)

¹³² https://www.instagram.com/p/Cf4brvtlxV0/?img_index=1 (Accessed October 10, 2024.) ("that time I graduated from Ivy League law school.")

¹³³ https://www.instagram.com/p/CciejDiFsTl/?utm_source=ig_web_copy_link&igshid=MzRIODBiNWFIZA== (Accessed October 10, 2024.)

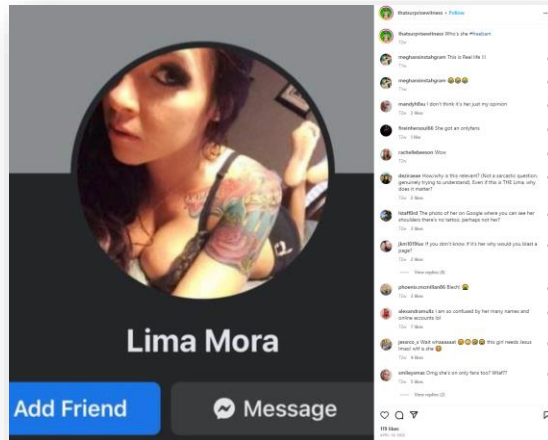
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175. Since Defendants posted this picture amid their efforts to vilify Ms. Jevremović, Defendants' viewers immediately realized that Ms. Courville was saying that the female in the picture is Ms. Jevremović.

176. Various viewers of the post also pointed out that the picture shows an OnlyFans account, and commented, for example:

Omg she's on only fans too? Wtaf??

She got an onlyfans.

And

Looks like only fans acct.

177. Defendants' viewers reasonably interpreted Defendants' post as Defendants telling their viewers that Ms. Jevremović has an OnlyFans account.

178. Ms. Courville furthered her campaign against Ms. Jevremović by including the false statement that Ms. Jevremović is involved in pornography, without any conceivable legitimate purpose to say so except to harass and cause harm to Ms. Jevremović's reputation.

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179. After more than three years of Defendants' thousands of postings about Ms. Jevremović and AURA, the top search engine results for Ms. Jevremović and AURA are now almost all Defendants' false and otherwise intimidating social media content.

180. At the same time, Defendants' videos regarding Ms. Jevremović make up more than half of Ms. Courville's top ten most viewed videos, from which it can be inferred that Ms. Courville has operated with the awareness of the economic potential from distributing falsehoods about Ms. Jevremović.

181. To date, Defendants are continuing their defamatory statements against Plaintiffs. Ms. Courville stated to her audience, through a video streamed on June 27, 2023:

they're going to sue me for telling the truth, you better not have no skeletons in your damn closet. You better not have a single femur bone in your closet because I'm gonna find it. Oh yes I am. Stuff you never ever thought that I was gonna find I'm gonna find it and then if I find it and it was public which almost every single thing I ever find is public I'm gonna tell every damn person about it who will listen. Yes, I will. Do not sue me for telling the truth bitch! I bet you learned your lesson now! Didn't you? So, long story short I've spent the greater part of the last two weeks probably 10 to 15 hours a day searching every single possible nook and cranny—not only of the internet but of the physical field of reality in order to find every single skeleton, every femur, every skull, every kneecap, every pinky toe bone...

182. Defendants know that what they are disseminating is false. Defendants are betting that they can say false and defamatory statements without repercussions.

FIRST COUNT

Libel

(By Plaintiff Lima Jevremović against All Defendants)

183. Plaintiffs incorporate the allegations set forth above in Paragraphs 1 through 182 as though fully set forth in this paragraph.

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184. Defendants published defamatory statements of and concerning Ms. Jevremović, including, but not limited to the false statements referenced in Paragraphs 26 to 182, above.

185. Defendants published to the public, including but not limited to their many viewers, these false statements through their social media channels.

186. All of Defendants statements are false and/or made with reckless disregard for the truth or falsity of these statements.

187. Ms. Jevremović's reputation and business endeavors have been negatively impacted, if not destroyed, by Defendants' statements. She has suffered humiliation, emotional distress, anger, embarrassment, frustration, fear, loss of income, severe anxiety, stress, shame, mortification, sleeplessness, and other physical manifestations thereof resulting from Defendants' above-described actions.

188. Defendants intentionally and maliciously made the false and defamatory statements, referenced in Paragraphs 26 to 182, above, since February 2022, in an attempt to benefit themselves by gaining more online attention and compensation for more views on their social media publications.

189. Defendants published their statements with the knowledge of the falsity of those statements or a reckless disregard for the truth or falsity of these statements, and thus, Defendants acted with actual malice sufficient to support an award of punitive damages.

190. Defendants false and defamatory statements, including but not limited to those statements referenced in Paragraphs 88, 89, 114, 121, 122, 124, 144, 145, 146, 174-175, and 178, constitute libel *per se*.

12.

191. As a direct and proximate result of Defendants published false and defamatory statements to third parties about Ms. Jevremović, which they knew to be false and/or acted in reckless disregard of the truth or falsity of those statements, Ms. Jevremović has been and continues to be damaged.

SECOND COUNT

Libel

(By Plaintiff AURA against All Defendants)

192. Plaintiffs incorporate the allegations set forth above in Paragraphs 1 through 191 as though fully set forth in this paragraph.

193. Defendants published defamatory of and concerning AURA, including, but not limited to the false statements referenced in Paragraphs 26 to 182, above.

194. Defendants published to the public, including but not limited to their many viewers, the false statements through their social media channels.

195. All of Defendants statements are false and/or made with reckless disregard for the truth or falsity of these statements.

~~166,196.~~ AURA's reputation has been negatively impacted due to Defendants' above-described actions; AURA has lost substantial investments, opportunities, and income resulting from Defendants' defamation, and AURA and its CEO, Ms. Jevremović, have been exposed to hatred, contempt, and the loss of the goodwill and confidence felt toward them by others, because of Defendants' libelous statements.

197. Defendants intentionally and maliciously made the ~~above quoted~~ false statements, referenced in Paragraphs 26 to 182, above, over several months in an attempt to benefit themselves by gaining more online attention and compensation for more views on their social media publications.

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~~167, 198.~~ Defendants ~~made these false published their~~ statements ~~in wanton and~~
~~willful disregard of AURA's rights,~~ with knowledge of ~~their~~ the falsity ~~of those statements~~ or
~~a~~ reckless disregard for ~~whether the statements were true.~~ Defendants ~~knew or should have~~
~~known at the time they made the~~ truth or falsity of those statements ~~that serious harm would~~
~~arise from their conduct,~~ and thus, Defendants, acted with ~~knowledge of the harm caused,~~
~~nevertheless continued such conduct unabashedly.~~ Defendants' outrageous, egregious, and
exceptionally wrongful behavior should be punished in the form of punitive damages to deter
them from similar wrongful conduct in the future. actual malice sufficient to support an award
of punitive damages.

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~~168.~~ ~~These~~ As a direct and proximate result of Defendants publishing false and
defamatory statements expose about AURA ~~and its CEO, Jevremović, to hatred, contempt,~~
~~and the loss of the goodwill and confidence felt toward them by others.~~

~~169.~~ ~~Furthermore, these,~~ which they knew to be false and/or acted in reckless
disregard of the truth or falsity of those statements ~~have a tendency to injure, and did in fact~~
~~injure, Plaintiffs' business operations in the addictions recovery and mental healthcare~~
~~industry, including but not limited to their use of therapist guided exposure therapy~~
~~implementing virtual reality technology and telehealth solutions.~~

~~170.~~ ~~These statements are entirely false. As a result of Defendants' publications,~~
~~Plaintiffs have suffered reputational harm in an amount to be proved at trial.~~

~~171, 199.~~ ~~As a result of Defendants' publications,~~ AURA has ~~lost business~~
~~opportunities in an amount~~ been and continues to be ~~proven at trial.~~ damaged.

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~~172.~~ Defendants' conduct in publishing and republishing the above statements was
actuated by actual malice and/or accompanied by a wanton and willful disregard of the effect

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~~their statements would have on Plaintiffs' reputations, which foreseeably might be harmed by Defendants' republications. Such conduct entitles Plaintiffs to an award of punitive damages under N.J.S.A. 2A:15-5.9, et seq., to both punish and deter Defendants' wanton conduct in an amount to be proven at trial.~~

THIRD COUNT

Invasion of Privacy – Intrusion upon Seclusion

(By Plaintiff Lima Jevremović against All Defendants)

~~173.~~200. Plaintiffs ~~hereby~~ incorporate the allegations set forth above in Paragraphs 1 through ~~172~~199 as though fully set forth in this paragraph.

~~174. Plaintiff has alleged (i) an intentional intrusion (ii) upon the seclusion of another that is (iii) highly offensive to a reasonable person.~~¹³⁴

~~175.~~201. Plaintiff ~~has successfully alleged an intentional intrusion, where she was substantially certain she lacked any indicia of consent to commit the intrusive acts alleged herein. Plaintiff has alleged that Defendants released~~Defendants intentionally intruded upon Ms. Jevremović's seclusion by, among other things, intentionally releasing personal information without any permission to do so, and to the contrary, over Plaintiff's vehement objections.

202. Specifically, Defendants ~~have released highly published~~ personal, ~~and~~ private information regarding PlaintiffMs. Jevremović and her family, including Plaintiff'sMs. Jevremović's family's home addresses, the name and address of the church PlaintiffMs. Jevremović attends in Los Angeles, Plaintiff'sMs. Jevremović's phone number, ~~and~~

73. ¹³⁴~~Hennessey v. Coastal Eagle Point Oil Co.~~, 129 N.J. 81, 609 A.2d 11, 17 (1992) (citing Restatement (Second) of Torts § 652B).

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~~Plaintiff's~~ Ms. Jevremović's social security number,¹³⁵ as well as the names and photos of ~~Plaintiff's~~ Ms. Jevremović's husband, sisters, mother, and mother-in-law.

203. Defendants' intentional release of Ms. Jevremović's social security number to her viewers, alone, constitutes a violation of N.J.S.A. §58:8-164.

~~176-204.~~ Moreover, Defendants' release of ~~Plaintiff's~~ Ms. Jevremović's personal information, and encouragement of Ms. Courville's followers¹³⁶ to act on that information,¹³⁷ has caused further intrusions and invasions into Plaintiff's privacy via death threats and text messages of dead bodies from unknown numbers, strangers showing up uninvited and unannounced at ~~Plaintiff's~~ Ms. Jevremović's home, and drones entering and surveilling ~~Plaintiff's~~ Ms. Jevremović's property to watch ~~Plaintiff~~ Ms. Jevremović and her family.

~~177. Plaintiff~~ The public has ~~alleged herein that Defendants have intruded into Plaintiff's otherwise private seclusion that the plaintiff has regarding her person or private life. Specifically, Defendants have intruded upon Plaintiff's family life, home~~ no legitimate interest in learning of Ms. Jevremović's personal and ~~property,~~ private information, and ~~church~~ the publication of Ms. Jevremović's personal and ~~religious life.~~

~~178-205.~~ The above listed intrusions on Plaintiff's privacy, such as the release of ~~her private contact private~~ information and social security number, would undoubtedly be highly offensive to ~~the ordinary~~ a reasonable person.

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¹³⁵ https://www.instagram.com/p/CfMCi1dOg51/?img_index=2 (Accessed October 14, 2024). The Application for Appointment as Guardian posted by Defendants initially contained Ms. Jevremović's Social Security Number, unredacted. When accessed on October 14, 2024, Ms. Jevremović's SSN was redacted. As such, it is respectfully submitted that Defendants have admitted that posting Ms. Jevremović's SSN is unlawful by redacting the SSN later.

74. ¹³⁶ June 27, 2023 YouTube video with Courville touting the contributions of her followers to her activities in digging into Jevremovich's personal life: <https://www.youtube.com/watch?v=Vh6j4YHIxoE>.

¹³⁷ June 27, 2023 YouTube video with Ms. Courville touting the contributions of her followers to her activities in digging into Jevremovich's personal life: <https://www.youtube.com/watch?v=Vh6j4YHIxoE>.

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~~179,206.~~ Plaintiff has suffered immense emotional and financial harm as a direct and proximate result of Defendants' invasion into her privacy as described herein wrongful conduct. Ms. Jevremović has suffered and continues to suffer emotion and financial harm.

FOURTH COUNT

Invasion of Privacy – False Light

(By Plaintiff Lima Jevremović against All Defendants)

~~180,207.~~ Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through ~~179,206~~ as though fully set forth in this paragraph.

~~181,208.~~ Defendants gave publicity to exposed Ms. Jevremović in a matter concerning Plaintiff that Defendants knew was false light, by making defamatory statements about Ms. Jevremović's character, history, activities and beliefs.

~~182,209.~~ Defendants either knew that the publicized material was false and would place Plaintiff Plaintiffs in a false light or acted with reckless disregard as to whether the publicized defamatory statements were false and/or with reckless disregard for the false impression created by the publicized defamatory statements. Specifically, Defendants made the defamatory statements and publications regarding Plaintiff with knowledge or reckless disregard of their falsity as described in Counts I and II.

~~210.~~ The defamatory statements made by Defendants so misrepresented Plaintiff's Ms. Jevremović's character, history, activities, and/or beliefs that a reasonable person in Plaintiff's position would find the material highly offensive. In fact, significant numbers

~~183,211.~~ As a direct and proximate result of people who have viewed these defamatory statements have been so affected by them that Plaintiff Defendants' wrongful

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conduct, Ms. Jevremović has ~~received death threats and text messages of dead bodies from unknown numbers, strangers have shown up uninvited~~suffered and ~~unannounced at Plaintiff's home and recently, drones entered Plaintiff's property and hovered above Plaintiff and Plaintiff's mother~~continues to surveil them. A reasonable person would not only find Defendants' statements highly offensive but would be offended and shocked by the effect Defendants' statements have had on other persons, and Defendants' continuing to make such statements knowing that Plaintiff faced such egregious threats to her safety based thereon.damages.

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~~184. The publicity caused by Defendants' defamatory statements was the cause of injuries, damages, and/or losses sustained by Plaintiff.~~

FIFTH COUNT

~~—Domestic Violence Act ("DVA") Harassment (N.J.S.A. § 2C:25-~~

~~19(a)(13))~~

~~(By Plaintiff Lima Jevremović against All Defendants)~~

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~~185. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 184 as though fully set forth in this paragraph.~~

~~186. Harassment under the DVA occurs where a person with purpose to harass another, "[m]akes, or causes to be made, a communication or communications anonymously or at extremely inconvenient hours, or in offensively coarse language, or any other manner likely to cause annoyance or alarm." N.J.S.A. § 2C:33-4(a). "[A]nnoyance" under that subsection means to "disturb, irritate or bother." *State v. Hoffman*, 149 N.J. 564, 580 (1997). The provision in N.J.S.A. 2C:33-4(a) prohibiting conduct communicated in any manner likely to cause annoyance or alarm encompasses where those modes of communicative harassment "are also invasive of the recipient's privacy." *Id.* at 583.~~

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~~187. The Act further provides that the court shall consider, among other factors: the existence of immediate danger to person or property and the existence of a verifiable order of protection from another jurisdiction. N.J.S.A. 2C:25-29(a). Here, a Temporary Restraining Order is attached as Exhibit 1, that has been issued pending a hearing on September 25, 2023, based on the harm that has been caused to Plaintiff in California. See Exhibit 1.~~

~~188. As alleged in multiple instances of harassing conduct above, Defendants have falsely suggested that Jevremović had an OnlyFans page with pornographic films and photographs (she does not and never has), which false suggestion would not have been made except as to cause annoyance or alarm, and which was invasive of the Plaintiff's privacy.~~

~~189. As alleged above, Defendants have published to the Internet Jevremović's social security number, date of birth, home phone number, multiple private home addresses of Jevremović and her family members, along with urgings to her followers that would be suggestive that the pieces of highly personal and sensitive information are to be used in nefarious ways. Even though Courville has occasionally issued brief disclaimers regarding the usage of this personal identifying information, the context of the release of the information would suggest that the sole purpose of such releases was to frighten, intimidate and harass Jevremović.~~

~~190. As a result, Plaintiff and her family have been forced to relocate from their homes multiple times, hire around the clock security, and have obtained a Temporary Restraining Order based on the aforementioned conduct of Defendants (See Exhibit 1), that has thus caused Plaintiff financial harm, as well as pain and suffering.~~

~~SIXTH COUNT~~

~~—Domestic Violence—Cyber harassment (N.J.S.A. § 2C:25-33.4.1)~~

~~—(By Plaintiff Lima Jevremović against All Defendants)~~

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~~191. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 190 as though fully set forth in this paragraph.~~

~~192. Cyber harassment under the DVA occurs where making a communication in an online capacity via any electronic device or through a social networking site and with the purpose to harass another, the person, and knowingly sends, posts, comments, requests, suggests, or proposes any lewd, indecent, or obscene material to or about a person with the intent to emotionally harm a reasonable person or place a reasonable person in fear of physical or emotional harm to his person; or threatens to commit any crime against the person or the person's property. N.J.S.A. § 2C:25-33.4.1.~~

~~193. Here, among the other allegations pleaded above, Courville did post to her @ThatSurpriseWitness Instagram posted on April 22, 2023, which on information is operated by Defendants Courville, Benipal, and That Surprise Witness TV LLC, a lewd photograph¹³⁸ falsely suggesting that Jevremović had an OnlyFans¹³⁹ page and linking to pornographic films and photographs that are not of Jevremović; Defendants knowingly used such lewd and indecent material solely with the purpose of causing emotional harm to Jevremović, and without any legitimate purpose.~~

~~194. Defendants combined to conduct their outrageous, cruel, and malicious doxing and cyber harassment of Plaintiff, including the actions mentioned herein, with the knowledge that their publications could cause Plaintiff to suffer harassment and humiliation.~~

~~195. The acts of Defendants resulted in damage to Plaintiff.~~

SEVENTH COUNT

75. ¹³⁸ https://www.instagram.com/p/CeiejDiFsTl/?utm_source=ig_web_copy_link&igshid=MzRlODBiNWFlZA== (Accessed September 9, 2023).

76. ¹³⁹ <https://www.complex.com/life/a/joshua-espinoza/what-is-onlyfans-explainer> (Accessed September 9, 2023).

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Intentional Infliction of Emotional Distress

(By Plaintiff Lima Jevremović against Defendant Brittany Jeream Courville)

~~196,212.~~ Plaintiffs ~~hereby~~ incorporate the allegations set forth above in Paragraphs 1 through ~~195,211~~ as though fully set forth in this paragraph.

~~197.~~ The New Jersey Supreme Court in the seminal case *Buckley v. Trenton Saving Fund Soc.* sets forth the common law cause of action for the tort of intentional infliction emotional distress: one must intentionally or recklessly commit an extreme and outrageous act which proximately causes plaintiff severe emotional distress. *Buckley v. Trenton Saving Fund Soc.*, 111 N.J. 355, 366 (1988).

~~198.~~ The nature of the act or conduct must be “so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized community.” *Id.* (quoting Restatement, Second, Torts, § 46).

~~199.~~ Similarly, there is a rather rigorous, while objective, standard for how severe the distress must be that is suffered by plaintiff: “so severe that no reasonable man could be expected to endure it.” *Cole v. Laughrey Funeral Home*, 376 N.J.Super. 135, 148 (App.Div.2005) (“The tort of intentional infliction of emotional distress requires emotional trauma that is severe.”).

~~200,213.~~ Here, there is no doubt that Defendants’ Ms. Courville’s distribution of Plaintiff’s Ms. Jevremović’s home address, her mother’s home address, and myriad other releases of private information, including Plaintiff’s Ms. Jevremović’s phone number and social security number, ~~was released~~ with the aim of inflicting devastation and emotional distress on Plaintiff Ms. Jevremović and her family — - and that Defendants’ Ms. Courville’s actions did in fact cause devastation and emotional distress.

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~~201. Further, the publication of a photo falsely suggesting Plaintiff was distributing pornographic materials via OnlyFans was but one example of the conduct alleged above, plainly released to torment and distress Plaintiff; Defendants' conduct in publicly touting this obscene lie did in fact cause devastation and emotional distress.~~

~~214. Defendants combined to conduct their outrageous, cruel, and malicious Ms. Jevremović has suffered, and continues to suffer, emotional distress as a result of Defendants' wrongful conduct. She regularly sees a psychiatrist and a therapist. In April 2024, Ms. Jevremović was diagnosed of depression. The emotional distress that Ms. Courville has inflicted on Ms. Jevremović has exacerbated physical conditions of Ms. Jevremović as well.~~

~~202-215. As a direct and proximate result of Ms. Courville's intentional infliction of emotional distress, including the doxing and cyber-harassment of Plaintiff, with the knowledge that their publications Ms. Jevremović, so severe that no reasonable person could cause Plaintiff to suffer harassment be expected to endure it, Ms. Jevremović has been, and potential violence will continue to be damaged.~~

SIXTH COUNT

~~203. The acts of Defendants resulted in damage to Plaintiff. In fact, as a direct result of Defendants' distribution of Plaintiff's and her family's private information, Plaintiff and her family have been forced to move homes, relocate to different states, and hire around the clock security.¹⁴⁰~~

EIGHTH COUNT

Negligent Infliction of Emotional Distress

77. ¹⁴⁰ Danielle Keats Citron, Addressing Cyber Harassment: An Overview of Hate Crimes in Cyberspace, 6 Case W. Res. J.L. Tech. & Internet at 4 (2015): <https://scholarlycommons.law.case.edu/jolti/vol6/iss1/3> ("Victims fundamentally change their lives. They move because they no longer feel safe at home.")

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(By Plaintiff Lima Jevremović against All Defendants)

(By Plaintiff Jevremović against All Defendants)

204,216. Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through 203,215 as though fully set forth in this paragraph.

205. For a claim of negligent infliction of emotional distress, a plaintiff must plead that the defendant had a duty to the plaintiff and that the defendant breached that duty, proximately causing the plaintiff's injury of genuine and substantial emotional distress. *Laseurain v. City of Newark*, 349 N.J. Super. 251, 277 (App. Div. 2002).

206. Whether the defendant has a duty of care to the Plaintiff depends on whether it was foreseeable that the plaintiff would be seriously mentally distressed. *Id.*

207,217. Here, Defendants were aware of the risk of serious mental distress to Jevremović as a result of Defendants' distribution of acted negligently when Defendants published and otherwise distributed Plaintiff's home address (three different private addresses after Ms. Jevremović has been forced to move as a result of Ms. Courville's doxing), Ms. Jevremović's mother's home address, 141, Ms. Jevremović's sister Dahlia's sister's private home address, along with release of links to pornography with the false suggestion that it was Ms. Jevremović in the pornography, and the myriad false statements and releases of private information as pleaded above.

208. As such, Defendants breached their duty of care to Jevremović as they combined to jointly conduct outrageous, cruel, and malicious doxing and cyber harassment of Jevremović despite knowledge that their conduct had caused Jevremović severe emotional

¹⁴¹ <https://www.youtube.com/watch?v=CLiFEyC0WK8> (Accessed September 5, 2023). <https://www.youtube.com/watch?v=CLiFEyC0WK8> (Accessed September 5, 2023). When accessed on October 22, 2024, the video is no longer available. It is hereby submitted that Defendants admitted that this video should not have been published because Ms. Courville removed the video at a later date.

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~~distress, and despite knowledge that Jevremović's reporting the conduct to law enforcement in three states.~~

~~209-218. The Defendants' acts of Defendants~~ resulted in damage to ~~Plaintiff Ms. Jevremović~~ and her family, including but not limited to, forcing ~~Plaintiff Ms. Jevremović~~ and her family to relocate, and ~~24-7~~to hire ~~24/7~~ security.

~~210-219. Defendants conduct herein has caused Ms. Jevremović extensive additional mental anguish¹⁴² and financial harm. As of April 2024, Ms. Jevremović was clinically diagnosed with depression. Ms. Jevremović has been regularly visiting a psychiatrist and mental therapist. Ms. Jevremović is also developing heart condition related to the emotional distress that she is suffering from.~~

~~220. Ms. Jevremović has suffered, and continues to suffer, emotional distress as a result of Defendants' wrongful conduct. She regularly sees a psychiatrist and a therapist. In April 2024, Ms. Jevremović was diagnosed of depression. The emotional distress that Ms. Courville has negligently inflicted on Ms. Jevremović has exacerbated physical conditions of Ms. Jevremović as well.~~

~~221. As a direct and proximate result of Ms. Courville's negligent infliction of emotional distress, including the doxing and cyber-harassment of Ms. Jevremović, so severe that no reasonable person could be expected to endure it, Ms. Jevremović has been, and will continue to be damaged.~~

SEVENTH COUNT

78. ¹⁴²~~Danielle Keats Citron, Addressing Cyber Harassment at 4-5: ("Victims experience severe emotional distress, anxiety, and depression.")~~

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~~NINTH COUNT~~

~~Unfair Competition~~

~~Tortious Interference with Contractual Relations~~

~~(By Plaintiff AURA against All Defendants)~~

~~(By Plaintiff AURA against All Defendants)~~

~~244-222.~~ Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through ~~240~~221 as though fully set forth in this paragraph.

223. By or around March 2022, AURA received \$1.5 million for funding, and was valued at approximately \$10 million. AURA received investment from seasoned investors.

224. Defendants tortiously interfered with the contracts that AURA had with its investors by, among other things, intentionally disseminating false information that harms AURA's reputation.

225. The interference was intentionally inflicted by Defendants, who are not party to those contracts, and without justification.

226. The interference caused harm to AURA because the investors that had already invested in AURA chose to renege on their investment due to Defendants' false statements and accusations.

227. AURA was closed in February 2024.

228. As a direct and proximate result of Defendants tortious interference with AURA's contractors and its investors, AURA has suffered and will continue to suffer damages.

~~EIGHTH COUNT~~

~~212.~~ The actions of Defendants as alleged above were done deliberately and intentionally.

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~~213. The actions of Defendants misled the public regarding AURA and/or products in violation of the common law of unfair competition of the State of New Jersey. Specifically, Defendants have actively spread defamatory statements and falsehoods about AURA, while Courville simultaneously began contributing to another online health company, Giddy.~~

~~214. The actions of Defendants as alleged above were committed with the intention of deceiving or defrauding the public in violation of the common law of unfair competition of the State of New Jersey.~~

~~215. Specifically, Defendants actions have effectively frozen investment in AURA, forestalled further development of AURA's new health-based business, and acted to siphon potential investors interested in a health start-up away from AURA.~~

~~216. Defendants' actions as alleged herein have caused and will continue to cause irreparable damage and injury to AURA if not enjoined by this Court.~~

~~TENTH COUNT~~

~~Unfair Competition~~

~~Tortious Interference with Prospective Economic Advantage~~

~~(By Plaintiff ~~Jevremović~~AURA against All Defendants)~~

~~217, 229.~~ Plaintiffs hereby incorporate the allegations set forth above in Paragraphs 1 through ~~216~~228 as though fully set forth in this paragraph.

~~218. The actions of Defendants as alleged above were done deliberately and intentionally to bring down Jevremović and to siphon off Jevremović's followers and viewers to Defendants' "That Surprise Witness" social media channels, and to deceive or defraud the public into following Defendants' social media channels instead of Jevremović, in violation of the common law of unfair competition of the State of New Jersey.~~

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~~219. The actions of Defendants misled the public regarding Jevremović as a social media influencer in the health space, in violation of the common law of unfair competition of the State of New Jersey.~~

~~220. Specifically, Defendants have actively spread defamatory statements, falsehoods, and misleading statements about Jevremović, where negative commentary receives more traction online than positive content. At the same time, Courville contributed to another competing online health company, Giddy, that was also in the health space.~~

~~221. Specifically, Defendants' actions have effectively destroyed Jevremović's business as a YouTube commentator herself, forestalling Jevremović's growth as commercially successful social media personality in the health space, after Defendants' social media blitzkrieg demonizing Jevremović, and siphoning viewers and followers to Defendants' social media channels, and profiting thereby in the form of Patreon sponsors, advertising on Defendants' YouTube channel and other methods of monetization that Defendants wrongfully obtained at the harm and expense of Jevremović.~~

~~222. Defendant's actions as alleged herein have caused and will continue to cause irreparable damage and injury to AURA if not enjoined by this Court.~~

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—
—

~~— **PRAYER FOR RELIEF**~~

~~230. By or around March 2022, AURA received \$1.5 million for funding, and was valued at approximately \$10 million. AURA received investment from seasoned investors.~~

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231. Many prospective investors showed demonstrated interest in investing in AURA, and expressed their interest either orally or by providing a Letter of Intent.

232. After Defendants began publishing false and defamatory statements that cause harm to AURA's reputation, the prospective investors, including those who had provided a Letter of Intent, refused to invest in AURA.

233. Defendants intentionally interfered with AURA's prospective contractual or economic relationship intentionally without justification of excuse.

234. Defendants' intentional interference caused AURA's loss of the expected advantage.

235. As a direct and proximate result of Defendants tortious interference with AURA's potential investors, AURA has suffered and will continue to suffer damages.

WHEREFORE, Plaintiffs pray for Judgment as follows, Ms. Jevremović and AURA, hereby demand the following relief in favor of Ms. Jevremović and AURA, and against Defendants:

1. For general damages according to proof, but not less than \$75,001;

2. For compensatory damages according to proof;

3. For special damages for damage to reputations, losses of business opportunities, and losses of investment opportunities according to proof, but not less than the jurisdictional minimum of this Court;

4. For the maximum available punitive damages per Plaintiff per cause of action;

5-a. For a permanent injunction to remove all statements and publications adjudged libelous and to estop Defendants from publishing additional actionable statements under the causes of action alleged;

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~~6. For pre and post judgment interest as allowed by law;~~

~~b. For Awarding Plaintiffs actual damages;~~

~~c. Awarding Plaintiffs punitive damages;~~

~~d. Awarding Plaintiffs special damages damage to reputations, losses of business opportunities, and losses of investment opportunities;~~

~~e. Awarding Plaintiffs interest;~~

~~f. Attorneys' fees and costs of suit; and such~~

~~7.g. Any other and further relief as this the Court may deem just deems equitable and~~
proper.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury for all matters triable.

~~1.~~ Respectfully submitted,
~~2.~~

~~3.~~ _____

~~s/ Elliot D. Ostrove~~

~~4.~~ Elliot D. Ostrove, Esq. (Bar No. 025581997)
~~5.~~ EPSTEIN OSTROVE
~~6.~~ 200 Metroplex Drive, ~~Suit~~Suite 304
~~7.~~ Edison, New Jersey 08817
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~~11.~~ Email: e.ostrove@epsteinostrove.com

~~s/ Neville L. Johnson~~

~~Neville L. Johnson (Pro Hac Vice)~~

~~JOHNSON & JOHNSON LLP~~
~~439 North Canon Drive, Suite 200~~
~~Beverly Hills, California 90210~~
~~Telephone: (310) 975-1080~~
~~Facsimile: (310) 975-1095~~

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Email: njohnson@jillplaw.com

~~/s/~~ Rodney Smolla _____

Rodney Smolla
(Pro Hac Vice)
7 Brook Road
P.O. Box 77
Strafford, Vermont 05072
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Email: rodsmolla@gmail.com

Email: rodsmolla@gmail.com

~~12.~~ Attorneys for Plaintiffs Lima Ms. Jevremović and
Autonomous User Rehabilitation Agent, LLC

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Dated: ~~December 6, 2023~~October 23, 2024

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NEW JERSEY DISTRICT COURT LOCAL RULE 11.2 CERTIFICATION

I, Lima Jevremović, on my own behalf and on behalf of Autonomous User Rehabilitation Agent, LLC (“AURA”), hereby declare the following:

1. 1.—I am a Plaintiff in the present case, a citizen of California and the United States of America.
2. 2.—I am also the CEO of Autonomous User Rehabilitation Agent, LLC and, as such, I am authorized to make statements on the Company’s behalf.
3. 3.—I have fully reviewed the foregoing Third Amended Complaint, and aver that the matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and to those matters I believe them to be true.

I hereby certify that the matter in controversy in the foregoing ThirdFourth Amended Complaint is not the subject of any other civil action pending in any court, or of any pending arbitration or administrative proceeding, with the exception of an application for Domestic Violence Restraining Order filed the matter pending in Family Superior Court in of the State of California by Claimant, County of Los Angeles, Case No.: 24STRO00762, captioned Lima Jevremović, against Respondent, Brittany Jeream Courville at Case Number 23STRO05881, which thus far resulted in a Temporary Restraining Order attached as Exhibit 1, and which was served upon Defendant on September 11, 2023. the matter pending in Superior Court of the State of California, County of Los Angeles – Central District, Case No.: 23STRO05821, captioned Lima Jevremović v. Brittany Jeream Courville.

I certify under penalty of perjury that the foregoing is true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Executed on December 6, 2023. /s/ Lima Jevremović October 23, 2024

Lima Jevremović, on my own behalf, and
on behalf of Autonomous User
Rehabilitation Agent, LLC

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